

HL7 EHR Technical Committee
 EHR Interoperability Project Team

EHR Lifecycle Model (EHR/LM) Public Comment Reconciliation
 Summarized: 2 November 2007

Submitted by	Comment	Status/Resolution
Dan Russler, MD, Oracle, and others in lengthy EHR TC listserver discussion	<p>"The location of an action is bounded by the geographic region of the collection of participants for the action. In other words, if all the participants are in a single room, the action cannot be said to be located outside of the room. If the participants are spread across a political boundary, the action cannot be said to occur one side or other of the political boundary.</p> <p>"That said, a business rule, like a billing rule, might assert that the location of the patient is the determining geographic location of the action for purposes of the billing rule. However, such an assertion is no more "correct" than a billing rule that asserts that the location of the performer of the action determines the geographic location of the action for the purposes of the billing rule."</p>	<p>Currently the EHR/LM reflects the underlying EHR Interoperability Model (EHR/IM) requirement for Physical Act Location.</p> <p>Will post this issue to EHR/IM "parking lot" and update the EHR/IM appropriately in next revision cycle. Meanwhile, will remove Physical Act Location reference in EHR/LM.</p>
Georg Heidenreich, MD, Siemens, Germany	Comments pertaining to scope of EHR/IM and EHR/LM	Comments withdrawn by submitter

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<p>Dipak Kalra, PhD, University College London, UK</p>	<p>“The term Act Record is not ideal internationally, especially as the document is a requirements standard and its wording ought to be independent of any modelling formalisms that might be used to comply with it. We should agree an alternative name to describe an entry or set of entries in an EHR that constitute an appropriately defined part of the EHR for the purposes of life-cycle management. The term can be generic, but what matters is that we define it as a unit of EHR entry granularity that is appropriate to manage as a single unit from a life-cycle perspective (in the terms and definitions section, and early on in the body of the document.).</p> <p>“Example, for discussion: An "EHR legal unit" is a set of entries within an EHR that care to be managed as a single information entity from a medico-legal perspective; this unit of information will commonly be committed to an EHR at one point in time, be attested and version managed as a single unit, and be communicated whole between EHR systems.”</p>	<p>Clarifying text (for Introductory Section), proposed/agreed by Dr. Kalra:</p> <p>“EHR entry [is that] portion of an electronic health record documenting part or all of a delivered or intended care activity, a clinical observation or a statement concerning health status or needs, and which is to be managed as a whole from an EHR repository and life-cycle perspective.”</p>

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Ann Wrightson, CSW Group Limited, UK, and others	<p>“A viewpoint and proposal on interim data Interim data that is destined for the EHR (such as interim test results, letters dictated but not signed, provisional information) really belongs into one of two categories</p> <p>a) not yet placed in the EHR, but held in a local clinical system in a way that indicates that it is not yet approved/signed/ completed, and not for propagation, in which case it is not yet in the provenance of the EHR and is not in scope of this standard (although this must be stated in the document, for clarity)</p> <p>b) interim data that is shared, and on which clinical decisions might be made in a distributed environment, even knowing that the data carries some uncertainty; in this case the data ought to be retained and managed in the same way as any other EHR data, but clearly retain its badge of being interim and also later reference the final version of that information.”</p>	<p>Proposed clarifying text (for Introductory Section), agreed by Ann Wrightson:</p> <p>“The scope of the EHR Lifecycle Model is intentionally constrained to EHR entries committed to persistent storage in the EHR. Interim data or records, initiated or in process but not yet ready for persistent storage, is out of scope.”</p>