

Micky Tripathi
National Coordinator for Health IT
Office of the National Coordinator
Department of Health and Human Services
Mary E. Switzer Building
330 C Street, SW, Office 7009A
Washington, D.C. 20201

April 15, 2021

Re: United States Core Data for Interoperability (USCDI) Draft v2

Dear Mr. Tripathi,

On behalf of CommonWell Health Alliance, we are pleased to submit comments on the Office of the National Coordinator's United States Core Data for Interoperability (USCDI) draft v2 as published January 2021. We support the ONC as it works to improve interoperability in the United States across providers, payers, patients and other stakeholders and we are aligned in the belief that we need standard data formats to accomplish the goal of seamless interoperability in healthcare nationwide.

CommonWell Health Alliance is a not-for-profit trade association made of various health IT and health care stakeholders. As a membership-based trade association, we provide an environment to openly work on interoperability improvements across many cornerstones of health care including but not limited to technology companies, payers, State and Federal agencies, providers, clearing houses, and patients. When the Alliance launched seven years ago, we started with services centered around Care Treatment and provided the ability for providers to query across other provider systems and retrieve data about a given patient. We have and continue to be a patient-centered network available nationwide and are proud to have added Patient Access use cases to give individuals the ability to find and access their data through patient portals, personal health records and other patient-centric applications.

CommonWell has a simple vision: health data should be available to individuals and caregivers regardless of where care occurs. Additionally, access to this data must be built into health IT at a reasonable cost for use by a broad range of health care providers and the people they serve. At CommonWell, together with our service provider and members, we have created and deployed a vendor-neutral platform that breaks down the technological and process barriers that inhibit effective health data exchange. We leverage existing standards and policies in order to enable scalable, secure and reliable interoperability as easily as possible for our members and their customers across the nation. We believe the ONC's Strategic Plan aligns with our mission and vision.

We believe the proposed USCDI v2 draft appropriately balances expanding the standard healthcare dataset while not creating significant burden on developers and providers to incorporate the additional data into their products and resultant data flows.

That said, we would like to endorse one proposed addition from one of our connected providers. Fresenius Medical Care is a national provider of services and products for patients with End Stage Renal Disease (ESRD). Currently, dialysis information is not well represented in the standard data and this information can be critical as patients with ESRD encounter planned or emergent transitions of care.

Fresenius will be sending in their own comments regarding the specific data elements. We fully support the additions of these elements. We do recognize that dialysis related elements are not fully profiled yet and would encourage the ONC and the standards organization that complement the ONC's work to complete the appropriate profiles and include in the next readily available version of USCDI. If the profile development can be completed in the near term, we agree it would be appropriate in v2. If it takes more than a couple months, we strongly endorse this being included in v3.

Note on Our Comments

These comments are reflective of the opinions of the Alliance and its members in regard to the objectives of CommonWell. It is not intended to represent the individual comments of each of our Members. Comments made here are not intended to represent the view of any particular member; and we expect some of our members to submit their own comment letters.

Final Comments

The Alliance remains committed to patient-centric interoperability on a national scale with the goal of ubiquitous, secure exchange of clinical data to the benefit of providers, patients, payers, public health and all other stakeholders in health care and beyond. We are encouraged by the mission and vision of the ONC and affirm our commitment to being a strong partner in executing on the vision.

On behalf of the CommonWell Health Alliance, thank you again for the opportunity to comment on the latest draft of v2 for USCDI. For any clarification or comments, please feel free to contact me at paul@commonwellalliance.org.

Sincerely,



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