Academy of Nutrition and Dietetics

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DATE: September 23, 2019

TO: Department of Health and Human Services
The Office of the National Coordinator for Health Information Technology

FROM: Academy of Nutrition and Dietetics
Becky Gradl, Informatics Manager

SUBJECT: Thank you for the opportunity to review and comment on the ISA

The Academy of Nutrition and Dietetics (the Academy) would like to thank the Office of the National Coordinator for Health Information Technology (ONC) for the opportunity to provide comments on the Interoperability Standards Advisory (ISA). The Academy commends the ONC for compiling and publishing a list of all available standards to promote interoperability in healthcare.

The Academy is the world's largest organization of food and nutrition professionals, representing more than 107,000 registered dietitians, dietetic technicians, registered and other dietetics professionals. With a mission to accelerate improvements in global health and well-being through food and nutrition, the Academy is committed to improving the nation's health through education, research, and advocacy for dietetic professionals. The Academy would like to offer the following comments on the ISA related to nutrition standards.

Section I: Vocabulary/Code Set/Terminology Standards and Implementation Specifications
Representing Patient Allergies and Intolerances; Environmental Substances

The Academy recommends adding Common Environmental Substances for Allergy and Intolerance documentation (2.16.840.1.113762.1.4.1186.4) as Applicable Value Set(s) and Starter Set(s). This value set was developed by the HL7 Patient Care WG with participation from the Academy to support alignment across systems and was based on observed frequencies of use in large health systems.

Representing Patient Allergies and Intolerances; Medications

The Academy recommends adding Common Drug Classes for Allergy and Intolerance documentation (2.16.840.1.113762.1.4.1186.2) and Common Drug Substances for Allergy and Intolerance documentation (2.16.840.1.113762.1.4.1186.1) as Applicable Value Set(s) and Starter Set(s). These value sets were developed by the HL7 Patient Care WG with participation from the Academy to support alignment across systems and were based on observed frequencies of use in large health systems.

The Academy recommends adding a Nutrition section with the following details:

Representing Nutrition Assessment, Diagnosis, Interventions and Monitoring/Evaluation

Type	Standard / Implementation Specification	Standards Process Maturity	Implementation Maturity	Adoption Level	Federally required	Cost	Test Tool Availability
Standard	LOINC®Web Site Disclaimers	Final	Production	●●●○○	No	Free	N/A
Standard	SNOMED CT®Web Site Disclaimers	Final	Production	●●●○○	No	Free	N/A
Standard	eNCPT	Final	Production	●●●○○	No	$	N/A

Limitations, Dependencies, and Preconditions for Consideration	Applicable Value Set(s) and Starter Set(s)
▪ Electronic Nutrition Care Process Terminology (eNCPT) is owned, maintained, and distributed by the Academy of Nutrition and Dietetics to support standardization of the Nutrition Care Process. Many of the terms in the eNCPT have been mapped to SNOMED and/or LOINC. ▪ Work is currently underway to develop a food insecurity data set through the Gravity Project.	▪ Food and Nutrient Delivery SNOMED CT (2.16.840.1.113762.1.4.1095.2) ▪ Food and Nutrition Related History LOINC (2.16.840.1.113762.1.4.1095.78) ▪ Food and Nutrition Related History SNOMED CT (2.16.840.1.113762.1.4.1095.84)

Section II: Content/Structure Standards and Implementation Specifications
Exchanging Diet and Nutrition Orders Across the Continuum of Care

The second bullet point listed for the Limitations, Dependencies, and Preconditions for Consideration references that work is underway to create a HL7 CDA R2 Implementation Guide: C-CDA R2.1 Supplemental Templates for Nutrition, Release 1 (US Realm). The work for this Implementation Guide was completed in May 2018 and balloted as a Standard for Trial Use. The Academy recommends this Implementation Guide be listed in the grid of standards with the following details:

Implementation Specification	HL7 CDA R2 Implementation Guide: C-CDA R2.1 Supplemental Templates for Nutrition, Release 1 (US Realm)	Balloted Draft	Pilot	●○○○○	No	Free	No

Additionally, work is currently underway to develop more nutrition related FHIR resources. The Academy recommends ONC include the work on these standards as they become available and at a minimum include them with the Limitations, Dependencies, and Preconditions for Consideration. Currently, a draft version of HL7 FHIR Nutrition Intake resource has been included in the FHIR build, which the Academy recommends including in the ISA in order to receive feedback on the resource.

Section IV: Administrative Standards and Implementation Specifications
Health Care Attachments to Support Claims, Referrals and Authorizations

Under this section in the standards grid, the following HL7 standards are listed as having a cost:
- HL7 CDA® R2 Attachment Implementation Guide: Exchange of C-CDA Based Documents, Release 1 - US Realm
- HL7 CDA R2 Implementation Guide: Consolidated CDA Templates for Clinical Notes (US Realm) Draft Standard for Trial Use Release 2.1
- HL7 Implementation Guide for CDA® Release 2: Additional CDA R2 Templates - Clinical Documents for Payers – Set 1, Release 1.1 (US Realm)
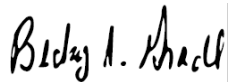
HL7 standards are provided at no cost. The Academy recommends the grid for these standards should be updated to indicate the cost for these standards is free.

Questions and Requests for Stakeholder Feedback

The Academy commends ONC for adding specialty care/setting pages as a quick link to standards related to these specific areas. As requested in question19-4, the Academy recommends ONC add specialty care/setting pages for Nutrition, Allergies, and Social Determinants of Health. Many of the standards related to these areas are scattered among the other sections of the ISA. Having a page for each of these three areas will better allow implementers to meet the interoperability needs of these specialty care/setting areas.

Thank you again for the opportunity to provide comments on the ISA. Please contact Becky Gradl, MPH, RD, LDN, CHES® by phone at 312-899-4835 or by email at bgradl@eatright.org with any questions or requests for additional information.

Sincerely,

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Informatics Manager, Academy of Nutrition and Dietetics