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DATE: November 9, 2020

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

FROM: Academy of Nutrition and Dietetics
Interoperability and Standards Committee
Sue Kent, MS, RDN, LD, Chair of the Interoperability and Standards Committee
Becky Gradl MPH, RD, LD, CHES®, Informatics Manager

SUBJECT: Thank you for the opportunity to comment on the Interoperability Standards Advisory

The Academy of Nutrition and Dietetics (Academy) committee of Interoperability and Standards (ISC) would like to thank the Office of the National Coordinator for Health Information Technology (ONC) for the opportunity to provide comments on the 2020 Interoperability Standards Advisory (ISA). The Academy commends 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 ISC works with national and international professional organizations that develop and harmonize health information technology standards to improve health information sharing and interoperability. The Academy and ISC would like to offer the following comments on the ISA.

Representing Patient Allergies and Intolerances; Food Substances

The Academy recommends the use of the *Common dietary substances for allergy and intolerances documentation* value set as the starter set for food allergens. This list was developed through the HL7 Patient Care Work Group as a collaborative effort and was compiled through actual allergy data from large health systems where combined observed frequencies were greater than 1000. Once created, the list was also reviewed by subject matter experts and found to be consistent with food labeling laws.[1]

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[1] HL7 Cross Paradigm Specification: Allergy and Intolerance Substance Value Set(s) Definition, Release 1
http://www.hl7.org/implement/standards/product_brief.cfm?product_id=482 Accessed November 4, 2020.

While not specific to the ISA content, the Academy encourages ONC to put regulations in place to require the use of food allergy and intolerance value sets that are created from SNOMED terms to better support patient care. The current process in many electronic health records (EHR) is to use drug allergen tables and link drug ingredients to food allergens. This can cause confusion with finding and documenting the right food allergen and can create patient safety issues.

Representing Nutrition Assessment, Diagnosis, Interventions and Monitoring/Evaluation

In the grid of standards, the Academy recommends changing the Standard / Implementation Specification listing from *eNCPT* to "***Nutrition Care Process Terminology (NCPT)***" to better define the name of the Academy's nutrition terminology for implementers who are unaware of the terminology by its acronym. Additionally, under the Limitations, Dependencies, and Preconditions for Consideration, the Academy recommends the following change to the first bullet point to better distinguish between the actual nutrition terminology (NCPT) versus the online tool (eNCPT) the Academy has to display the terminology:

> *Nutrition Care Process Terminology (NCPT) 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 NCPT have been mapped to SNOMED and/or LOINC.*

Exchanging Diet and Nutrition Orders Across the Continuum of Care

The Academy has been working on additional FHIR resources to support not only nutrition orders but capturing what a patient consumed. The Academy recommends adding the new FHIR R5 resources of Nutrition Intake and Nutrition Product to the grid of standards:

Nutrition Intake
Type: Emerging Standard
Standard / Implementation Specification: HL7® FHIR® Nutrition Intake Resource
Standards Process Maturity: Draft
Implementation Maturity: Draft
Adoption Level: Feedback Requested
Federally required: No
Cost: Free

Nutrition Product
Type: Emerging Standard
Standard / Implementation Specification: HL7® FHIR® Nutrition Product Resource
Standards Process Maturity: Draft
Implementation Maturity: Draft
Adoption Level: Feedback Requested
Federally required: No
Cost: Free

Appendix II - Models and Profiles

The link for *HL7 Standards - Section 4: EHR Profiles* takes the reader to HL7's master grid of standards so the reader is forced to search for functional profiles and models. The Academy recommends updating this link to take the reader directly to the listing of functional profiles and models. This updated link is: http://www.hl7.org/implement/standards/product_section.cfm?section=11.

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,
Sue Kent, MS, RDN, LD
Chair of the Interoperability and Standards Committee

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