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Micky Tripathi, PhD, MPP
National Coordinator for Health Information Technology
Office of the National Coordinator for Health Information Technology
Department of Health and Human Services
Mary E. Switzer Building
330 C Street SW
Washington, DC 20201

Submitted via www.healthit.gov

Dear National Coordinator Tripathi:

The Academy appreciates the opportunity to provide comments on the Office of the National Coordinator for Health Information Technology's (ONC) standard data set for exchange. The United States Core Data for Interoperability (USCDI) can progress the standardization of imaging data, which is a critical part of the infrastructure that will improve quality of care by creating a common platform that enables communication across physicians and institutions. The Academy is the largest association of eye physicians and surgeons in the United States. A nationwide community of nearly 20,000 medical doctors, we protect sight and empower lives by setting the standards for ophthalmic education and advocating for our patients and the public.

While we support all of the new data elements in USCDI version 2, we believe there are missed opportunities by the agency to accelerate the comprehensive, standardized exchange of data including complete ophthalmic imaging standards. When finalizing this iteration of USCDI, the ONC should ensure the USCDI includes the image itself, and not just the interpretation, as part of the core dataset for interoperability and quality patient care. We believe the communication of image-based data needs to be accurate and reliable, yet this has been extremely difficult to accomplish due to the use of multiple proprietary devices and data storage processes. A recent publication by Lee et al. (2021) discusses the challenges with exchanging digital imaging data from one manufacturer's equipment to another without the creation of a costly custom interface. The Digital Imaging and Communications in Medicine (DICOM) standard is recognized in the United States and throughout the world as the medical imaging standard, which includes a system of globally agreed-upon ophthalmological definitions.

The Academy has consistently advocated for imaging device manufacturers to standardize image formats to comply with the already established standards. By incorporating the image itself into the core dataset for interoperability, we believe this will help facilitate a move to standardization. Additionally, we support the addition of

these data elements, Date of Diagnosis and Date of Resolution, into the updated USCDI. It can be challenging to know what current problems are and what are resolved problems in the electronic health record (EHR) because these are not always documented but are vitally important for coordination of care and interoperability.

Broadly, the Academy is focused on making sure that medical technology is more relevant to the needs of the end user, the ophthalmologist, by ensuring seamless interoperability. We look forward to working with ONC to ensure communication and comprehension of image data between entities becomes a reality. Ophthalmic imaging standardization will allow the specialty to achieve workflow efficiencies, meet increased ophthalmic services demand, and provide high quality patient care. If we can provide any additional information please reach out to Kayla Amodeo, PhD, Director, Health Policy at kamodeo@aao.org.

Sincerely,

Michael X. Repka, M.D., M.B.A.,
Medical Director, Government Affairs