



April 15, 2021

Micky Tripathi, PhD, MPP  
National Coordinator for Health Information Technology  
Office of the National Coordinator for Health Information Technology (ONC)  
U.S. Department of Health and Human Services  
330 C St SW, Floor 7  
Washington, DC 20201

RE: Draft United States Core Data for Interoperability (USCDI) Version 2

Dear Dr. Tripathi:

RadNet appreciates the opportunity to comment on the draft USCDI version 2. Specifically, we support: (1) the proposed new “Diagnostic Imaging” data class which would consist of two new data elements, “Diagnostic Imaging Report” and “Diagnostic Imaging Order,” plus the existing data element for “Diagnostic Imaging Narrative” (included under Clinical Notes in USCDI version 1) and (2) the use of the LOINC® (Logical Observation Identifiers Names and Codes) as their respective standard.

RadNet, Inc. is the leading national provider of freestanding, fixed-site diagnostic imaging services in the United States based on the number of locations and annual imaging revenue. Our goal is to deliver high-quality, conveniently accessible care in the most cost-effective manner possible -- all of which makes us the alternative to the higher-priced hospital and health system-based or owned imaging provider. RadNet has a network of 340 owned and/or operated outpatient imaging centers across Arizona, California, Maryland, Florida, Delaware, New Jersey, and New York. Many of our centers are located in or near underserved communities, thus providing at-risk populations with access to high-quality imaging care. Our nearly 800 radiologists and approximately 8,600 employees perform an estimated eight million imaging procedures annually. In addition, RadNet provides radiology information technology solutions, teleradiology professional services, and other related products and services to customers in the diagnostic imaging industry.

### **Diagnostic Imaging in the USCDI**

Imaging interoperability represents a tremendous opportunity for the Medicare program and its beneficiaries. Through its proposed inclusion in the draft USCDI version 2, RadNet appreciates that the ONC has recognized imaging in the context of its push towards greater interoperability and patient access. With this in mind, we agree that the Diagnostic Imaging Narrative data element should move from the Clinical Notes data class in USCDI version 1 to the new Diagnostic Imaging data class in version 2. However, we would like to see some additional clarity between the Diagnostic Imaging Narrative and Diagnostic Imaging Report because an imaging report typically includes a narrative of the imaging interpretation.



Leading Radiology Forward

We are pleased, in particular, that the Diagnostic Imaging Order is a proposed data element in USCDI version 2. Despite the adoption of health information systems and electronic interfaces, the vast majority of orders for imaging services, particularly in ambulatory settings like freestanding imaging centers, still are conducted on written scrips brought in by the patient or sent by fax from the referring clinician's office. Manual entry of order information is slow, costly, and subject to error. This type of interoperability will improve the timeliness of patient care and reduce the number of repeat imaging studies.

#### **LOINC Standard**

RadNet supports the use of the LOINC® as the applicable standard for the Diagnostic Imaging Narrative, Diagnostic Imaging Order, and Diagnostic Imaging Report data elements. LOINC® is a well-established, robust, and international open standard for the exchange and use of health data.

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Thank you again for the opportunity to share our feedback and recommendations regarding the draft USCDI version 2. Please contact Michael Mabry, RadNet's Director of Public Policy and Economic Analysis, at [michael.mabry@radnet.com](mailto:michael.mabry@radnet.com) or 443.810.4798 if you have questions, require additional information, and to arrange a follow-up discussion.

Sincerely,

A handwritten signature in black ink that reads 'Susan Hollabaugh'.

**Susan Hollabaugh**

Vice President, Regulatory Analysis and Conformance

cc: Ranjan Jayanathan, RadNet  
Michael Mabry, RadNet