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Micky Tripathi
National Coordinator for Health Information Technology
Office of the National Coordinator for Health Information Technology
Mary E. Switzer Building, Mail Stop: 7033A
330 C Street SW
Washington, DC 20201

RE: Draft United States Core Data for Interoperability Version 2

Dear National Coordinator Tripathi,

On behalf of Providence, thank you for the opportunity to provide feedback in response to the Office of the National Coordinator for Health Information Technology's (ONC) draft of United States Core Data for Interoperability (USCDI) version 2.

Providence is one of the largest health systems in the United States, with a seven-state footprint that spans Alaska, California, Montana, New Mexico, Oregon, Texas, and Washington. Our diverse family of organizations employ 120,000 people who serve in 51 hospitals, 1,085 clinics, a health plan, senior services and housing, and many other health and educational services. Our non-profit health system is dedicated to serving the Medicaid population, and each year we work to provide care and services where they are needed most, including investments in community benefit that in 2019 totaled \$1.5 billion.

We appreciate the opportunity to provide comments on the proposed draft of the USCDI version 2. We support many of the elements that ONC is proposing to add. Providence is sharing most of them on our patient portal and Continuity of Care Documents (CCDs). In addition, our specific comments on the draft elements are as follows:

Clarify encounter time: The ONC website says that encounter time "Specifies the date and time associated with the encounter, for clinical context. This would include an admission and discharge date and time for a hospital encounter or a date/time of an office visit/appointment." **Providence asks ONC to clarify this further to define encounter time more fully.**

Date of resolution: This data element is not something that is captured and can be easily shared. **Providence urges ONC to remove this data element from the draft USCDI v.2.**

Providence reviewed the level 2 data elements that were not included in the Draft USCDI v2 and has the following comments on including them in the final USCDI v.2:

- **Food and non-med allergy data elements:** Providence supports adding these to the final USCDI v. 2. We believe it would be appropriate and useful to include these data elements because many people are allergic to soy (food allergy) and soy is in a lot of medications. Additionally, many people are allergic to latex and nickel (non-med allergies) and it would be beneficial for healthcare providers to know this information. Providence already shares these two allergy data elements on their patient portal and CCDs so it would not be burdensome to our organization if this was added to the final USCDI v2.
- **Provider DEA and NPI:** We urge ONC to remove Provider DEA and NPI to the final version of the USCDI v.2. Providence believes this information does not need to be shared with other providers and should never be shared with patients.
- **Provider telecom, role, and location:** Providence supports adding these data elements to the final USCDI v2.
- **Diagnostic studies:** Providence believes Diagnostic Studies is another data element that should be added to the final USCDI v.2. These studies are beneficial to share with all healthcare providers and with the patient. Providence already shares diagnostic studies on their patient portal and CCDs so it would not be burdensome for us if this was added to the final USCDI v2.
- **Encounter location:** Providence supports adding this data element to the final USCDI v.2
- **Disposition:** Providence urges ONC to remove this data element from the final USCDI v.2.
- **Social Determinants of Health (SDOH):** Providence strongly supports adding these data elements to the final USCDI v.2. Providence has been working with the Gravity Project and working internally to ensure these data elements are mapped in our system.
- **Medicare Patient Identifier and Mother's Maiden Name:** Providence urges ONC to remove these data elements from the final version. We believe that sharing this information would make it easier for hackers to potentially obtain this information.

We hope that you find our input informative. For more information, please contact Sarabeth Zemel, manager, federal regulatory affairs and engagement, at (425) 525-3228 or via email at Sarabeth.Zemel@providence.org.