

September 30, 2021

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Reference: Annual Interoperability Standards Advisory review for 2021

Dear Dr. Tripathi:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit these comments relative to the annual review of the *Interoperability Standards Advisory (ISA)*. Representing more than 107,000 registered dietitian nutritionists (RDNs),¹ nutrition and dietetic technicians, registered (NDTRs), and advanced degree nutritionists, the Academy is the world’s largest association of food and nutrition professionals and is committed to a vision of a world where all people thrive through the transformative power of food and nutrition. The Academy works through its Interoperability and Standards Committee (ISC) to engage national and international standards organizations that develop and harmonize health information technology standards to improve health information sharing and interoperability related to nutrition. We respectfully offer the following feedback on the ISA.

Section I: Vocabulary/Code Set/Terminology Standards and Implementation Specifications

Dietary and Nutritional Needs > Representing Nutrition Assessment, Diagnosis, Interventions and Monitoring/Evaluation

The Academy recommends adding the value set [Nutrition Diagnosis Grouping \(2.16.840.1.113762.1.4.1095.85\)](#) under the Applicable Value Set(s) and Starter Set(s) column as this starter set contains terminology relating to diagnoses.

The Academy also recommends removing “HL7® FHIR® Nutrition Intake Resource” and “HL7® FHIR® Nutrition Product Resource” in the grid as these are not vocabulary, code set, or terminology standards. Additionally, these FHIR resources are listed under [Diet and Nutrition > Exchanging Diet and Nutrition Orders Across the Continuum of Care](#) in *Section II: Content/Structure Standards* of the ISA.

Overall

Similar to the above comment of removing the nutrition-related FHIR resources from the *Dietary and Nutritional Needs > Representing Nutrition Assessment, Diagnosis, Interventions*

¹ The Academy approved the optional use of the credential “registered dietitian nutritionist (RDN)” by “registered dietitians (RDs)” to more accurately convey who they are and what they do as the nation’s food and nutrition experts. The RD and RDN credentials have identical meanings and legal trademark definitions.

and Monitoring/Evaluation grid that is related to vocabulary, code sets, or terminology standards, we have noticed several other areas where content is not necessarily related to the heading Vocabulary/Code Set/Terminology. As examples, under the *Cognitive Status > Representing Patient Cognitive Status* and *Functional Status/Disability > Representing Patient Functional Status and/or Disability*, implementation guides are listed in these two grids. Implementation guides seem more appropriate for *Section II: Content/Structure Standards* of the ISA. The Academy recommends ONC review all sections and sub-sections to ensure the content matches the section header and provide guidance or clarification as to what should be listed in each section to avoid unnecessary confusion.

Section II: Content/Structure Standards and Implementation Specifications

Diet and Nutrition > Exchanging Diet and Nutrition Orders Across the Continuum of Care

The Academy recommends removing the following bullets in the *Limitations, Dependencies, and Preconditions for Consideration* section:

- HL7® FHIR® Nutrition Product Resource (<http://build.fhir.org/nutritionproduct.html>)
- HL7® FHIR® Nutrition Intake Resource (<http://build.fhir.org/nutritionintake.html>)
- Additionally, work is underway on the HL7 FHIR Nutrition Intake Resource

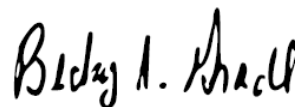
These bullets are redundant with the content that is listed in the grid.

The Academy appreciates your consideration of these comments regarding the annual review of the *Interoperability Standards Advisory*. Please contact either Jeanne Blankenship at 312-899-1730 or by email at jblankenship@eatright.org or Becky Gradl at 312-899-4835 or by email at bgradl@eatright.org with any questions or requests for additional information.

Sincerely,



Jeanne Blankenship, MS RDN
Vice President, Policy Initiatives and Advocacy
Academy of Nutrition and Dietetics



Becky Gradl, MPH, RD, LDN, CHES®
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