

April 29, 2022

Thank you for the opportunity to comment of USCDI Version 3. Mass General Brigham is supportive of the efforts to define data sets across the country for interoperability. In review of V3, we agree with most of the new elements. We support patient's caregiver involvement in their care but have some concerns regarding the proposed elements of Related Person's Name and Related Person's Relationship.

Our concerns are related to the privacy of the related person. If the related person is listed in the patient's record, we are concerned their identity will be revealed in future disclosures they are unaware of. Or, worse, if there is clinical information attached to the related person, this would be extremely problematic and violate the related person's privacy. For example, in patient Susan Smith's record, it is listed that her sister, Mary has breast cancer. If Susan's only sister, Mary, is listed as the related person, we have inadvertently shared her breast cancer status. Through our Release of Information department, we take care to redact names of family members in the record to avoid-violating the privacy of the patient's family member.

We ask for further clarification related to the intention of including Related Person's Name and Related Person's Relationship as part of the USCDI v3. Our impression is that it is for continuity of care, however, we question whether a receiving facility would use this information instead of obtaining it firsthand from a patient.