

April 29, 2022

Micky Tripathi, Ph.D., M.P.P.
National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
330 C St SW
Washington, DC 20416

Dear Dr. Tripathi,

Thank you for the opportunity to provide comments on ONC's draft of the United States Core Data for Interoperability Version 3 (USCDI v3).

As researchers who have contributed to the development of person-centered, interoperable data elements for persons receiving home and community-based supports and services, we support the inclusion of new data classes including functional status, disability status and mental function. Self-care, mobility, instrumental activities of daily living, living arrangements and caregiving domains are important aspects related to successful community living. In assessments such as the Functional Assessment Standardized Items (FASI) set and the IRF-PAI, MDS, and OASIS Functional Assessment and Goals, function is assessed as the assistance needed to perform everyday self-care, mobility, and other daily living tasks. This appears to align more with the proposed class of Disability status. The proposed class labeled "Functional Status" includes data elements more related underlying capacity and health status. An alternative label to "functional status" may help avoid confusion with existing terminology.

We believe that locating personal priorities and goals under a data single class of "Goals" poses a risk of separating functional (i.e., disability) goals and personal priorities from the specific domains of data elements to which they relate. With regards to FASI personal priorities (listed below with relevant LOINC codes), we recommend these be located within the data class of relevant functional (i.e., disability) items.

- 94876-0 Self-care priorities for the next 6 months [CMS Assessment]
- 94877-8 Mobility priorities for the next 6 months [CMS Assessment]
- 94878-6 Instrumental activities of daily living priorities for the next 6 months [CMS Assessment]
- 94911-5 Living arrangement priorities for the next 6 months [CMS Assessment]
- 94931-3 Caregiving priorities for the next 6 months [CMS Assessment]

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "Trudy Mallinson". The signature is fluid and cursive, with a long horizontal line extending to the right.

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On behalf of:

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