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February 15, 2023

Micky Tripathi, PhD, MPP
National Coordinator
Office of the National Coordinator for Health Information Technology (ONC)
Department of Health and Human Services
Hubert Humphrey Building, Suite 729
200 Independence Avenue SW
Washington, DC 20201

Re: ONC's Draft United States Core Data for Interoperability (USCDI) Version 4

Dear Dr. Tripathi,

I'm writing on behalf of Sound Generation's Project Enhance® to express our support for the Physical Activity Alliance's application to add Physical Activity Status as a data element to the next iteration of the U.S. Core Data for Interoperability (USCDI).

The proposed Physical Activity Status data element is comprised of four standardized measures:

(1) Average frequency of moderate to strenuous exercise each week (measured in "days");
(2) Average duration of moderate to strenuous exercise (measured in "minutes");
(3) Total minutes of moderate-vigorous physical activity/week (a product of the first two measures); and
(4) Average frequency of muscle-strengthening exercise each week (measured in "days").

These measures are validated in the peer-reviewed literature[1,2] and are aligned with the 2018 U.S. Physical Activity Guidelines for Americans.[3]

Integrating the Physical Activity Status data element into existing platforms is readily feasible for electronic health record systems. In fact, two of the measures are already included in the voluntary 2015 Certification Companion Guide on Social, Psychological, and Behavioral data (Paragraph (a)(15)(v)); which is currently followed by approximately 150 electronic health record systems in the U.S. Therefore, for the systems that already adhere to the certification criteria, adding the Physical Activity Status data element would simply require the introduction of the muscle-strengthening measure, which should fit into the existing workflow, user-interface, and data exchange codes. Furthermore, the Physical Activity Alliance is developing a HL7 FHIR implementation guide involving the proposed measures, which we expect will be sent to balloting in May 2023 and published in the Fall of 2023.

How does Sound Generations, a multiservice nonprofit focused on the needs of older adults and people aging with disability, intersect with this work? Our work with the University of Washington (UW) Health Promotion Research Center started in 1993, when researchers and Group Health Cooperative (a health maintenance organization) collaborated with us to develop and test an evidence-based physical activity program for older adults: Enhance®Fitness. Throughout our thirty-year history, crucial support from several directions

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[1] Coleman KJ, Ngor E, Reynolds K, Quinn VP, Koebnick C, Young DR, Sternfeld B, Sallis RE. Initial validation of an exercise "vital sign" in electronic medical records. Med Sci Sports Exerc. 2012;44:2071–2076. doi:10.1249/MSS.0b013e3182630ec1
[2] Harris C, Watson K. A data users guide to the BRFSS physical activity questions: How to assess the 2008 Physical Activity Guidelines for Americans. Atlanta, GA: CDC; 2011.

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has spurred and sustained growth. National policymakers and funders have embraced EnhanceFitness, prompting significant uptake far beyond our home region of western Washington. **Program participants themselves, not to mention their physicians, bolstered by subjective and objectively demonstrable changes in health and fitness, have been important champions for driving demand for program expansion at the community level.** The Centers for Medicare and Medicaid Services' 2013 Report to Congress[3] showed an estimated total medical savings per participant of $945. EnhanceFitness is currently being delivered in multiple modes (in-person, livestream and hybrid) in 44 states and growing.

Older adults and people living with disability are disproportionately affected by chronic disease and falls, the leading–yet highly preventable--causes of death and disability among older Americans. Being physically active is one of the most important lifestyle behaviors for modifying these risks: Physical activity improves mood, daily function, mobility, and sleep. It decreases depression and pain. It increases life expectancy and quality of life and reduces health care costs. Referral to proven, low-cost, accessible, and inclusive programs like EnhanceFitness is an easy, inexpensive, and highly effective way to improve lives.

Evidence suggests that routine assessment of physical activity by clinicians leads to more referrals for exercise programming, greater weight loss for patients with obesity, and improved hemoglobin A1c levels in patients with diabetes.[4] Despite these potential outcomes, however, widespread implementation of physical activity assessment is inhibited by the lack of standardized physical activity measures. Adding Physical Activity Status to the USCDI would further solidify and standardize physical activity measures in the electronic health records in the U.S., which could dramatically improve the health of the public and bring U.S. healthcare costs down.[5] Therefore, we urge ONC to maintain Physical Activity Status as a data element within the final USCDI version 4.

Improving the flow of data between health care systems and community organizations will help us reach more people with proven physical activity programs to improve health outcomes. Thank you and please reach out to paiged@soundgenerations.org or (206)268-6739 if we can answer any other questions.

Sincerely,

Paige Denison
Director – Health, Wellness and Project Enhance

[3] Report to Congress: The Centers for Medicare and Medicaid Services' evaluation of community-based wellness and prevention programs under Section4202(b) of the Affordable Care Act. 2013;4202:1–87

[4] Grant RW, Schmittdiel JA, Neugebauer RS, Uratsu CS, Sternfeld B. Exercise as a vital sign: a quasi-experimental analysis of a health system intervention to collect patient-reported exercise levels. *J Gen Intern Med*. 2014;29(2):341-348. doi:10.1007/s11606-013-2693-9

[5] Lin CY, Ball TJ, Gentile NL, McDonald VF, Humbert AT. Associations Between Physical Activity Vital Sign in Patients and Health Care Utilization in a Health Care System, 2018–2020. *Journal of Physical Activity and Health*. Published online December 08, 2022. doi:10.1123/jpah.2022-0266

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