

Submitted via <https://www.healthit.gov>

May 3, 2023

The Honorable Micky Tripathi, Ph.D. MPP  
Office of the National Coordinator for Health Information Technology  
U.S. Department of Health and Human Services  
330 C Street SW, 7th Floor Washington, DC 20201

RE: Draft U.S. Core Data for Interoperability (USCDI) version 4

Dear National Coordinator Tripathi:

On behalf of our 159,000 members, the American Dental Association (ADA) is pleased to provide comments on the proposed USCDI version 4.

**USCDI Procedures Data Element**

**Vocabulary Standard:** The ADA recommends removing the clause “For technology primarily developed to record dental procedures:” from the listing of the Code on Dental Procedures and Nomenclature (CDT).

The Code on Dental Procedures and Nomenclature, also known as Current Dental Terminology (CDT), is the only code set used in dentistry to document and report dental procedures. The CDT is a HIPAA-named standard and is mandated for use by dental providers and payers for dental claims. CDT is also the only code set used to document dental procedures that have been performed on patients in a dental record. It is our assertion that CDT is the only appropriate vocabulary standard for dental procedures and should be present to accurately represent dental clinical procedures in all health information technology.

**Our recommendation for the modified text in USCDI version 4 reads:**

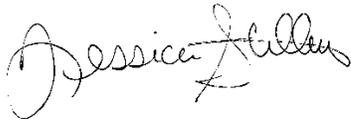
*Code on Dental Procedures and Nomenclature (CDT), maintained and distributed by the American Dental Association, for dental services.*

Additionally, the ADA encourages the ONC to provide additional clarity on the adoption of versions 2, 3, and 4 of USCDI and how backward compatibility will be managed. We recognize that all stakeholders need time to plan, prepare, and implement and there may be significant costs involved in the adoption of new data classes and elements, however, delayed implementation will continue to impede national interoperability and the limitations of health information software to accurately represent dental procedures will continue to have a direct impact on patients, providers, and quality reporting.

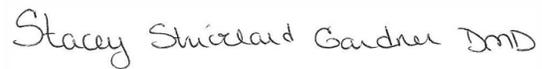
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Please contact Rebekah Fiehn, Director, Coding and Dental Data Exchange, ADA Practice Institute at [fiehn@ada.org](mailto:fiehn@ada.org) as needed for any follow-up on this commentary.

Sincerely,



Jessica Stille-Mallah, D.M.D.  
Chair, Council on Dental Benefit Programs



Stacey Gardner, D.M.D.  
Vice Chair, Council on Dental Benefit Programs

JSM/SG:nt