

March 3, 2023

National Coordinator  
Health and Human Services Office of the  
National Coordinator for Health IT  
U. S. Department of Health and Human Services  
Washington DC, 20202

Re: Average Blood Pressure in USCDI v. 4.0

Dear Mr. Tripathi:

As we wrote in September 2022, Omada Health, Inc. (Omada) offers clinically efficacious asynchronous services for the management of hypertension. We have served 25,000 adults since we launched these services 5 years ago. Our curriculum is based on the American Heart Association standards and clinical best practices.

We urge the adoption of Average Blood Pressure in USCDI to ensure that physicians and nurse practitioners in everyday practice can seamlessly interoperate with programs like Omada's. We reviewed the clinical value of Omada's programs in our September 2022 letter.

There is also a pragmatic reason for the necessity of the Average Blood Pressure data element—in particular, with home based blood pressure monitoring, there may be a large volume of readings captured which could potentially overwhelm the clinician's medical record should it be integrated into the system. This in turn, may lead to poor data analysis and could impact the quality of care delivered. Average solves for this problem

Since September, 2022, the crisis of capacity in primary care and healthcare worker shortages has become more well known, including recent hearings on the topic sponsored by the Senate [Committee on Health, Education, Labor and Pensions](#). Solutions like Omada can help. But, without a data standard for this very important marker of heart health, healthcare providers across the system, from Omada to large health systems, will be unable to easily share information about the blood pressure control of their shared patients

Thank you very much for your consideration

Sincerely,

A handwritten signature in black ink, appearing to read 'Justin Wu', with a stylized, elongated flourish extending from the end.

Justin Wu, MD  
Medical Director  
Omada Health, Inc.

A handwritten signature in black ink, appearing to read 'Lucia Savage', with a cursive, flowing style.

Lucia Savage, JD  
Chief Privacy & Regulatory Officer  
Omada Health, Inc.