

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

March 25, 2025

Office of the Assistant Secretary for Technology Policy/National Coordinator for Health Information Technology  
U.S. Department of Health and Human Services  
330 C Street SW, 7th Floor  
Washington, DC 20201

On behalf of the 159,000 members of the American Dental Association (ADA), we are pleased to provide comments on the Draft United States Core Data for Interoperability Version 6 Data Element List. We appreciate your continued efforts on the annual USCDI updates to help drive interoperability by keeping pace with clinical, technology, and policy changes. ADA supports improving health care data interoperability by establishing a consistent baseline of harmonized data elements.

The ADA was particularly encouraged by the publication of the USCDI Version 5 and the accompanying Office of the National Coordinator for Health Information Technology (ONC) Standards Bulletin for July of 2024, which included the Code on Dental Procedures and Nomenclatures (CDT) in the Corrected Applicable Standard Reference for Procedures. We thank you for ensuring that CDT has parity with other standard terminology in the procedures data element and stand ready to assist USCDI with any assistance in its further development and maintenance of the data elements.

**In the proposed USCDI V6, under the Diagnostic Imaging Test data class, we recommend including the Code on Dental Procedures and Nomenclature (CDT), maintained and distributed by the American Dental Association as an applicable vocabulary standard.**

Radiographic imaging is an essential adjunct to a comprehensive clinical examination in diagnosing and managing patients with confirmed or suspected dental disease, pathosis, injury, or other clinical signs or symptoms (e.g., pain, trauma). Imaging modalities in dentistry have advanced rapidly in recent decades, resulting in increased use of digital imaging, portable handheld X-ray systems, and three-dimensional cone beam computed tomography (CBCT). 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 imaging procedures. The CDT is a HIPAA-named standard and is mandated for use by dental providers and payers for dental claims. It is our assertion that CDT is the only appropriate vocabulary standard for dental imaging procedures and should be present to represent dental diagnostic imaging in all health information technology accurately.

We encourage adding CDT codes to the applicable vocabulary standards for Diagnostic imaging tests in USCDI version 6.

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

Sincerely,

A handwritten signature in dark ink, appearing to read "Mark A. Moats". The signature is fluid and cursive, with the first name "Mark" being more prominent.

Mark A. Moats, D.M.D.  
Chair, Council on Dental Benefit Programs

A handwritten signature in dark ink, appearing to read "Shane A. Ricci". The signature is fluid and cursive, with the first name "Shane" being more prominent.

Shane A. Ricci, D.D.S.  
Chair, Council on Dental Practice