



COLLEGE of AMERICAN PATHOLOGISTS

April 11, 2025

The Honorable Steven Posnack, MS, MHS
Acting Assistant Secretary for Technology Policy and Acting National Coordinator for
Health Information Technology
Assistant Secretary for Technology Policy and Office of the National Coordinator for
Health Information Technology (ASTP)
U.S. Department of Health and Human Services
330 C St SW
Floor 7
Washington, DC 20201

Dear Acting Assistant Secretary Posnack:

The College of American Pathologists (CAP) appreciates the opportunity to comment to the Assistant Secretary for Technology Policy and Office of the National Coordinator for Health Information Technology (ASTP) on the draft of the United States Core Data for Interoperability (USCDI) version 6. As the world's largest organization of board-certified pathologists and leading provider of laboratory accreditation and proficiency testing programs, the CAP serves patients, pathologists and the public by fostering and advocating excellence in the practice of pathology and laboratory medicine. Data sharing through widely accepted standards is critical to ensure that health information is complete, available, and comprehensible across care settings for use in patient care, public health, and emergency (e.g., pandemic) preparedness and response. For broader sharing of electronic health information, the USCDI is critical to establishing foundational standards to support patient care.

ASTP specifically requested feedback on the diagnostic imaging data elements.

"ASTP has heard from a variety of interested parties, including the Healthcare Information Technology Advisory Committee (HITAC), that providing shareable links or detailed information about individual diagnostic imaging studies, series, and images offers great potential to improve access to images. Relatedly, HTI-2 Proposed Rule proposes to revise the certification criteria to include certification requirements to support capturing and documenting hyperlinks to diagnostic images. We seek feedback on what additional work is needed in this space to advance meaningful, secure, and shareable access to images across disparate networks, and we seek examples of real-world evidence of exchange."

While pathology interpretation and other clinical laboratory testing are increasingly incorporating digital pathology and review of whole slide imaging as part of primary diagnosis, a majority of a pathologist's diagnostic work is completed through interpreting



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non-digital/non-image specimens, such as body fluids and tissue specimens. The CAP would like to note in response to ASTP's request for information that in contrast to image types such as radiology—which are inherently electronic—most pathology cases nationally are not yet captured electronically. In the clinical laboratory, images produced as part of the laboratory workflow but not intended for reporting to the EHR (i.e., automated urine microscopy and blood smears, flow cytometry, capillary SPEP) do not currently have adequate export, storage, and linkage capabilities. Laboratory information systems (LISs) generally have limited capabilities for the types of modifications the ASTP describes. Including these capabilities would require vendors to significantly upgrade and modify LISs, which would likely increase the costs of these systems to laboratories.

In its comments to ASTP's *Health Data, Technology, and Interoperability: Patient Engagement, Information Sharing, and Public Health Interoperability (HTI-2) Proposed Rule*, the CAP consequently requested that pathology and clinical laboratory images be excluded from the ASTP's Health information technology (IT) certification requirements relating to diagnostic imaging unless those images are reported to the EHR and used for exchange between hospitals for patient care.¹ Moreover, unlike radiology images, which providers may consult, it is rare that a provider would need to consult a pathology image to compare with the pathology report to obtain additional diagnostic information that is not already written in the pathology report.

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Thank you for the opportunity to submit these comments. The CAP looks forward to working with the ASTP. Please direct questions on these comments to Han Tran at htran@cap.org.

¹ The CAP's comments to ASTP's HTI-2 Proposed Rule are here:
<https://documents.cap.org/documents/2024-HOD-SCC/CAP-HTI-2-Comment-Letter-FNL1024.pdf>.