

April 10, 2026

Thomas Keane, MD, MBA  
National Coordinator for Health IT  
Office of the National Coordinator for Health Information Technology  
U.S. Department of Health and Human Services  
330 C Street SW, 7th Floor  
Washington, D.C. 20201

*Re: Public Comment on USCDI draft v7*

Dear National Coordinator:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to comment on the draft of USCDI v7. Representing more than 112,000 registered dietitian nutritionists (RDNs), nutrition and dietetic technicians, registered (NDTRs), and advanced-degree nutritionists, the Academy is the largest association of nutrition and dietetics practitioners committed to accelerating improvements in global health and well-being through food and nutrition.

The Academy extends its sincere gratitude to ONC for the proposal to include Nutrition Order and Nutrition Assessment in the USCDI v7 draft. This monumental step will help to ensure that nutritional care is fully integrated into the digital healthcare ecosystem.

### **Current Exchange in IT Systems**

The proposed data elements are currently being exchanged and tested across multiple health IT environments:

- **Nutrition Order:** This element is actively exchanged using the HL7 FHIR NutritionOrder resource. Through the PACIO Project, it has undergone successful testing in Connectathons and is included in the PACIO Implementation Guide. Major EHR vendors, including Epic and Oracle Health, have already implemented FHIR endpoints for this resource, facilitating real-world exchange.
- **Nutrition Assessment:** Key nutrition assessment elements, such as malnutrition risk, intake patterns, and weight changes, are required in CMS DEL and MDS submissions and align with CMS and Joint Commission standards across hospital, specialty, and long-term care settings. These assessments support regulatory compliance and feed directly into CMS quality reporting and billing.

## Breadth of Use and Applicability

These data elements have universal applicability across the healthcare continuum:

- **Cross-Specialty Utility:** While critical for Registered Dietitian Nutritionists (RDNs), these data elements are used by Speech-Language Pathologists (for dysphagia/texture-modified diets), Occupational Therapists (for feeding ability), and Providers/Nurses (for therapeutic diet management).
- **Health Use Cases:** Standardized nutrition data is vital for managing such areas as chronic conditions (Diabetes, CKD), acute recovery (Sepsis, Surgery), and preventative health. It is also a fundamental area that is captured for CMS Quality Measures, such as the Malnutrition Care Score (MCS).

## Review of Definition, Nomenclature, and Standards

The Academy suggests a slight refinement to the proposed definition for Nutrition Assessment to better reflect its clinical scope.

### Nutrition Assessment:

- **Current Proposed Definition:** Assessment of a person's dietary intake.
- **Requested Revision:** Assessment of a person's nutrition status.
  
- **Current Applicable Standard:** LOINC (e.g., 75304-6, Nutrition status observation panel)
- **Requested Revision:** Change to SNOMED CT (e.g. 391132008, Nutrition Assessment Completed), LOINC 75303-8 Nutrition assessment Narrative, CPT Code 97802: Medical nutrition therapy; initial assessment and intervention, individual, face-to-face with the patient, CPT Code 97803: Medical nutrition therapy; re-assessment and intervention, individual, face-to-face with the patient.

**Rationale for Revisions:** "Dietary intake" is only one component of a nutrition assessment. A comprehensive assessment must also include anthropometric measurements (weight/height), biochemical data (lab results), and clinical findings (e.g., physical signs of malnutrition). Using the broader term "nutrition status" ensures the data element supports comprehensive clinician documentation rather than focusing solely on a patient's dietary intake.

### Nutrition Order:

- **Current Applicable Standard:**
- **Requested Revision:** Add SNOMED CT® Dietary Regime (182922004) and its sub-concepts, Enteral Feeding (229912004) and its sub-concepts, Mixed Breast Milk and Bottle Feeding (35011000087100), Breast Milk Feeding (1297276008), Bottle Feeding of Patient (40043006), and International Dysphagia Diet Standardization Initiative (IDDSI) terminology.

## Conclusion

The Academy reaffirms its strong support for these inclusions. Nutrition Assessment and Nutrition Order will substantially strengthen interoperable digital quality measurement, support quality programs, and improve patient outcomes across the healthcare continuum.

A handwritten signature in black ink that reads "Michelle Ashafa". The signature is written in a cursive style with a large initial 'M' and a long, sweeping tail.

Michelle Ashafa, MS, RD, LDN, PMP, CSM  
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Academy of Nutrition and Dietetics