Please enter your comments in Columns A-J. See Comments Guidance tab for more information.

Comment number	Commenter organization	Comment(s)	Page number(s)	Section(s)	Current content	Suggested Content/Change	Other suggested improvements	Comment Category	Submission Date
ISA_01	Federal Electronic Health Record Modernization (FEHRM) Program Office	Family history should not be limited to genetic aspect of disease: e.g., environmental exposures	112	Family Health History (Clinical Genomics)		Family history should include environmental exposures		Substantive	9/30/2021
ISA_02	U.S. Department of Veteran Affairs OEHRM TIO Interoperability	Add acronym for Office of the National Coordinator	3	Introduction to the ISA	The Interoperability Standards Advisory (ISA) represents the Office of the National Coordinator for Health Information Technology's current assessment of the heath IT standards landscape.	Add acronym ONC for Office of the National Coordinator		Administrative	9/30/2021
ISA_03	U.S. Department of Veteran Affairs OEHRM TIO Interoperability	How is ONC related to U.S. Department of Health & Human Services (HHS)	3	Introduction to the ISA	This document contains numerous links to other federal agencies and to private organizations. You are subject to these sites' privacy policies when you access them. HHS is not responsible for Section 508 compliance (accessibility) on other federal or private sites. HHS is not responsible for the contents of any "off-site" web page referenced from this document	Add how ONC is related to HHS		Administrative	9/30/2021
ISA_04	U.S. Department of Veteran Affairs Office of Health Informatics, VHA	Allergies and Intolerances: The current guidance appears to recommend the use of SNOMED CT finding/disorder concepts to represent patient allergies/adverse reactions (whether for foods, environmental substances, or medications). This is not advised. The simplest way to document allergies to substances is to document using the codes for those substances (i.e. RxNorm codes for medications, SNOMED CT codes for food allergies, environmental allergies, and drug class allergies). Using SNOMED CT findings/disorder codes adds a level of abstraction and complexity that has the potential to compromise patient safety. SNOMED CT has relationships between the allergy substances and corresponding finding/disorders. However, this is not guaranteed to be the case at all times for all substances. The SNOMED CT codes for the individual substances should be used to record allergies to substances. Note that the USCDI refers to "Substances" in the Allergies & Intolerances section as well, and the two documents should alien on this important topic.	5, 6-7	Allergies and Intolerances	NLM value sets representing SNOMED CT findings and disorders	The simplest way to document allergies to substances is to document using the codes for those substances (i.e. RxNorm codes for medications, SNOMED CT codes for food allergies, environmental allergies, and drug class allergies). Using SNOMED CT findings/disorder codes adds a level of abstraction and complexity that has the potential to compromise patient safety. SNOMED CT has relationships between the allergy substances and corresponding finding/disorders. However, this is not guaranteed to be the case at all times for all substances. The SNOMED CT codes for the individual substances should be used to record allergies to substances. Note that the USCDI refers to "Substances" in the Allergies & Intolerances section as well, and the two documents should alien on this important topic.		Critical	9/30/2021
ISA_05	U.S. Department of Veteran Affairs Office of Health Informatics, VHA	Representing Housing Insecurity: The responses provided in the answer list have individual LOINC codes, but only the LOINC panel code has been provided. It is recommended that the individual LOINC codes be provided for each response.	51	Social, Psychological, and Behavioral Data Interoperability Need: Representing Housing Insecurity	Answer list with only a LOINC panel code, not the individual LOINC codes What is your current housing situation? (LOINC® code 71802-3) • Answer list (LOINC® code LL5350-5) • I have housing • I do not have housing (staying with others, in a hotel, in a shelter, living outside on the street, on a beach, in a car, or in a park) • I choose not to answer that question	It is recommended that the individual LOINC codes be provided for each response.		Substantive	9/30/2021
ISA_06	U.S. Department of Veteran Affairs Office of Health Informatics, VHA	Representing Patient Dental Encounter Diagnosis: The OID provided does not appear to be in the NLM Value Set Authority Center (VSAC). It's not clear to what this OID refers or where it can be found.	15	Encounter Diagnosis, Assessment and Plan Interoperability Need: Representing Patient Dental Encounter Diagnosis	OID 2.16.840.1.113883.3.3150	An OID is provided without a hyperlink or context. Please clarify what this OID reference or where it can be found.		Substantive	9/30/2021
ISA_07	U.S. Department of Veteran Affairs Office of Health Informatics, VHA	Vocabulary/Code Set/Terminology Standards and Implementation Specifications: Throughout the Terminology Standards section of the document, the "Applicable Value Set(s) and Starter Set(s)" box for each data element has variable formatting. In some cases there are hyperlinks for NLM value sets (OIDs) and standardized vocabulary codes (LOINC, SNOMED CT), and in other cases there are no hyperlinks. In some cases the full text of a bullet point is hyperlinked, and in other cases only the standardized vocabulary code is hyperlinked. The representation of standardized vocabulary codes also different (see Tobacco Use section for multiple different variations).	Entire document	Vocabulary/Code Set/Terminology Standards and Implementation Specifications	As noted in Column E	The recommended representation is [Standardized Vocabulary Name | Identifier | Fully Specified Name or Term]. It would be helpful to the reader to make the formatting in this section of the document consistent for each data element.		Administrative	9/30/2021
ISA_08	U.S. Department of Veterans Affairs OIT/DSO/OTI	Given the comprehensive and detailed nature of this list and the broader impact to the VA outside of ONC's area of focus we look forward to reviewing in more detail over time with a broader VA community.	5,6,7,8,9,10	Allergies and Intolerances, Clinical Notes, and Cognitive Status	Interoperability Need: Representing Patient Allergic Reactions, Interoperability Need: Representing Patient Allergies and Intolerances; Environmental Substances, Interoperability Need: Representing Patient Allergies and Intolerances; Food Substances, Interoperability Need: Representing Patient Allergies and Intolerances; Medications, Interoperability Need: Representing Clinical Notes, Interoperability Need: Representing Patient Cognitive Status, Interoperability Need: COVID-19 Novel Coronavirus Pandemic	None	None	Substantive	9/30/2021
ISA_09	U.S. Department of Veterans Affairs OIT/DSO/OTI	Many of the items will have significant impact to the VA that are outside the scope of ONC's health focus. For example, standards to address where VA has an authoritative data source. For the ISA, this touches on themes like demographics, disability (VA versus ONC definition), industry and Occupation (DoD is usually not always accounted for), gender identity (not a clinical concept).	11	Demographics Interoperability Need: Representing Patient Contact Information for Telecommunications	N/A	None	None	Substantive	9/30/2021
ISA_10	U.S. Department of Veterans Affairs Veterans Health Information Exchange (VHIE)	Language needs to be stronger for the purpose of patient safety. Encouragement is not enough, all of the efforts downstream transformation challenges are the proof. Standards require strict rules to support high reliability organizations with high quality and complete data.	4	Introduction to the ISA	The Interoperability Standards Advisory (ISA) process represents the model by which the Office of the National Coordinator for Health Information Technology (ONC) coordinates the identification, assessment, and public awareness of interoperability standards and implementation specifications that can be used by the healthcare industry to address specific interoperability needs including, but not limited to, interoperability for clinical, public health, research and administrative purposes. ONC **encourages** all stakeholders to implement and use the standards and implementation specifications identified in the ISA as applicable to the specific interoperability needs they seek to address. Furthermore, ONC **encourages** further pilot testing and industry experience to be sought with respect to standards and implementation specifications identified as "emerging" in the ISA.	Language needs to be stronger for the purpose of patient safety. Standards require strict rules to support high reliability organizations with high quality and complete data.		Substantive	9/30/2021
ISA_11	U.S. Department of Veterans Affairs Veterans Health Information Exchange (VHIE)	Need to address that though the immunizations are medical products, they need to be clearly identified and exchanged as immunizations.	23, 24	Immunizations Interoperability Need: Representing Immunizations – Administered		Although immunizations are medical products, they need to be clearly identified and exchanged as immunizations.		Substantive	9/30/2021
ISA_12	U.S. Department of Veterans Affairs Veterans Health Information Exchange (VHIE)	Need to address that the additional medications, like immune globulins, are medications and should not be exchanged as an immunization.	23,24	Immunizations Interoperability Need: Representing Immunizations – Administered		Address additional medications, like immune globulins, are medications and should not be exchanged as an immunization.		Substantive	9/30/2021
ISA_13	U.S. Department of Veterans Affairs Veterans Health Information Exchange (VHIE)	Need to address the vaccines that are administered as a series with clear and strict exchange guidelines	25	Immunizations Interoperability Need: Representing Immunizations – Historical		Address vaccines that are administered as a series with clear and strict exchange guidelines.		Substantive	9/30/2021
ISA_14	U.S. Department of Veterans Affairs Veterans Health Information Exchanew (VHIE)	Need to clearly define medications as including: OTCs, botanicals, herbs… All those impact medication decisions	29.30	Medications Interoperability Need: Representing Patient Medications	The use of NDC in conjunction with RxNorm can help minimize gaps in representing medications, including compounded products, over-the-counter medications, and herbals. • Immunizations are not considered medications for this interoperability need	Clearly define medications as including: OTCs, botanicals, herbs… All those impact medication decisions		Substantive	9/30/2021
ISA_15	U.S. Department of Veterans Affairs Veterans Health Information Exchange (VHIE)	Need to represent the reading level - unclear if Level of Education is the right representation. Patient education, reports sent home with the patient - all need to be at the right comprehension level.	52	Social, Psychological, and Behavioral Data Interoperability Need: Representing Level of Education	A single question, "current educational attainment" used to determine the highest grade or level of school completed or highest degree received, developed as part of the National Health and Nutrition Examination Survey (NHANES) is best suited for this interoperability need			Substantive	9/30/2021
ISA_16	U.S. Department of Veterans Affairs Veterans Health Information Exchange (VHIE)	Need a standard patient matching algorithm. How can data exchange work when different patient matching strategies and algorithms are used?	62	Admission, Discharge, and Transfer Interoperability Need: Sending a Notification of a Patient's Encounter to a Record Locator Service		Need a standard patient matching algorithm for data exchange.		Substantive	9/30/2021
ISA_17	U.S. Department of Veterans Affairs Veterans Health Information Exchange (VHIE)	Data quality measures are very limited. The concept of the data quality being related to the clinical usability needs to be integrated into any Data Quality reporting.	76	Clinical Quality Measurement and Reporting Interoperability Need: Reporting Patient-level Quality Data for Quality Reporting Initiatives		The concept of the data quality being related to the clinical usability needs to be integrated into any Data Quality reporting.		Substantive	9/30/2021
ISA_18	U.S. Department of Veteran Affairs CIDMO-OHI (Diameter Health, Inc.)	Currently very challenging at the provider level to document these concerns meaningfully in a medical chart, except as physical exam entries. There is no input trigger for completing these and reporting results on the outbound. Supportive of the PACIO Workgroup's assessment. There are other inventories of delirium, depression and anxiety with loinc codes that could prove valuable	9	Cognitive Status Interoperability Need: Representing Patient Cognitive Status		Incorporate additional inventories - example - https://loinc.org/panels/category/clinical-assessments-scales-measures/neurology/mental-status-dementia/		Substantive	9/30/2021
ISA_19	U.S. Department of Veteran Affairs CIDMO-OHI (Diameter Health, Inc.)	Current content uses LOINC and SNOMED-CT	22	Health Concerns Interoperability Need: Representing Patient Health Concerns	• Health Concern Document (LOINC® code 75310-3)	Certain health concerns can be incorporated into problems and plans of care through CPT codes and ICD10 codes - https://www.hopkinsmedicine.org/johns_hopkins_healthcare/providers_physicians/resources_guidelines/provider_communications/2021/PRUP135_ICD10-km.pdf		Substantive	9/30/2021
ISA_20	U.S. Department of Veteran Affairs CIDMO-OHI (Diameter Health, Inc.)	Current content uses LOINC and SNOMED-CT	34.35	Pregnancy Status Interoperability Need: Representing Patient Pregnancy Status	LOINC® code: 82810-3 Pregnancy status • SNOMED CT®: • Patient currently pregnant (finding), 77386006 • Not pregnant (finding), 60001007 • Possible pregnancy (finding), 102874004 • LOINC® code: 11778-8 Estimated Delivery Date or 21299-3 Gestational age method	Pregnancy status can be reported by ICD10		Substantive	9/30/2021
ISA_21	U.S. Department of Veteran Affairs CIDMO-OHI (Diameter Health, Inc.)	Currently only LOINC for PHQ2/9, other inventories; also existent are anxiety inventories and somatization inventories	47	Social, Psychological, and Behavioral Data Interoperability Need: Representing Depression	• PHQ-2 panel LOINC® code 55757-9 • PHQ-9 panel LOINC® code 44249-1 (Listed for reference.)	LOINC 89211-7 — Beck Depression Inventory Fast Screen (BDI) https://loinc.org/60729-2/		Critical	9/30/2021
ISA_22	U.S. Department of Veteran Affairs CIDMO-OHI (Diameter Health, Inc.)	Currently only SNOMED CT	55	Tobacco Use Interoperability Need: Representing Patient Electronic Cigarette Use (Vaping)	• Electronic Cigarette User SNOMED CT® 722499006 • SNOMED code for "electronic cigarette user" 785889008 | Nicotine-filled electronic cigarette user (finding)| 786063001 | Non-nicotine-filled electronic cigarette user (finding)|	ICD10 and CPT codes represent methods of documenting vaping on the clinical front		Substantive	9/30/2021