



April 18, 2023

Micky Tripathi, PhD, MPP
National Coordinator
Office of the National Coordinator for Health Information Technology (ONC)
Department of Health and Human Services
Hubert Humphrey Building, Suite 729
200 Independence Avenue SW
Washington, DC 20201

Re: ONC's Draft United States Core Data for Interoperability (USCDI) Version 4

Dear Dr. Tripathi,

The National Athletic Trainers' Association (NATA) appreciates the opportunity to comment on the Physical Activity Alliance's application to add Physical Activity Status as a data element to the next iteration of the U.S. Core Data for Interoperability (USCDI).

About NATA

NATA is a professional organization serving more than 36,000 certified athletic trainers (ATs), students of athletic training, and other health care professionals. ATs are health care professionals who specialize in the prevention, diagnosis, treatment, and rehabilitation of sport – and work – related injuries and illnesses. These health care professionals prevent and treat chronic musculoskeletal injuries from sports, physical, and occupational activity and provide immediate care for these acute issues.

Currently, more than 5,000 ATs work in hospitals, outpatient rehabilitation clinics, and physician practices. Our mission is to represent, engage, and foster the continued growth and development of the athletic training profession and ATs as unique health care providers. As part of the health care team, working in collaboration with physicians, ATs provide injury and illness preventive care, wellness promotion and education services, emergent care, examination and clinical diagnosis, therapeutic intervention, and rehabilitation of injuries and medical conditions.¹ As the leading organization representing ATs, NATA seeks to ensure federal policies and programs are implemented recognizing the unique role ATs play in the provision of medical care.

The proposed Physical Activity Status data element is comprised of four standardized measures:

- (1) Average frequency of moderate to strenuous exercise each week (measured in “days”);
- (2) Average duration of moderate to strenuous exercise (measured in “minutes”);

¹ <http://www.bocatc.org/about-us/defining-athletic-training>



- (3) Total minutes of moderate-vigorous physical activity/week (a product of the first two measures); and
- (4) Average frequency of muscle-strengthening exercise each week (measured in “days”).

These measures are validated in the peer-reviewed literature^{2,3} and are aligned with the 2018 U.S. Physical Activity Guidelines for Americans.³

Integrating the Physical Activity Status data element into existing platforms is readily feasible for electronic health record systems. In fact, two of the measures are already included in the voluntary 2015 Certification Companion Guide on Social, Psychological, and Behavioral data (Paragraph (a)(15)(v)), which is currently followed by approximately 150 electronic health record systems in the U.S. Therefore, for the systems that already adhere to the certification criteria, adding the Physical Activity Status data element would simply require the introduction of the muscle-strengthening measure, which should fit into the existing workflow, user-interface, and data exchange codes. Furthermore, the Physical Activity Alliance is developing a HL7 FHIR implementation guide involving the proposed measures, which we expect will be sent to balloting in May 2023 and published in the Fall of 2023.

ATs know firsthand how being physically active is one of the most important lifestyle behaviors for maintaining physical health, mental health, and well-being.⁴ Including standardized physical assessments into all electronic health records may enhance care coordination throughout the health care system, including as between ATs and other health care practitioners as part of the care team. It may also help ATs serve their patients in more targeted, effective ways, and improve patient health outcomes. Further, standardizing the physical activity assessment would advance population health initiatives to allow a more accurate understanding of the physical health of Americans and improve data analytics capabilities to see trends, promoting research into this important field as well.

Evidence suggests that routine assessment of physical activity by clinicians leads to more referrals for exercise programming, greater weight loss for patients with obesity, and improved hemoglobin A1c levels in patients with diabetes.⁵ Despite these potential outcomes, however, widespread implementation of physical activity assessment is inhibited by the lack of standardized physical activity measures. Adding Physical Activity Status to the USCDI would further solidify and standardize physical activity measures in the electronic health records in the U.S., which could

² Coleman KJ, Ngor E, Reynolds K, Quinn VP, Koebnick C, Young DR, Sternfeld B, Sallis RE. Initial validation of an exercise “vital sign” in electronic medical records. *Med Sci Sports Exerc.* 2012;44:2071–2076. doi:10.1249/MSS.0b013e3182630ec1

³ Harris C, Watson K. A data users guide to the BRFSS physical activity questions: How to assess the 2008 Physical Activity Guidelines for Americans. Atlanta, GA: CDC; 2011.

⁴ US Department of Health and Human Services. *Physical Activity Guidelines for Americans*, 2nd edition. 2018.

⁵ Grant RW, Schmittdiel JA, Neugebauer RS, Uratsu CS, Sternfeld B. Exercise as a vital sign: a quasi-experimental analysis of a health system intervention to collect patient-reported exercise levels. *J Gen Intern Med.* 2014;29(2):341-348. doi:10.1007/s11606-013-2693-9



dramatically improve the health of the public and bring U.S. healthcare costs down.⁶ Therefore, we urge ONC to maintain Physical Activity Status as a data element within the final USCDI version 4.

If you have any questions, please do not hesitate to contact Amy Callender, Director of Government Affairs, at amyc@nata.org or (972) 532-8853.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kathy Dieringer', is written in a cursive style.

Kathy Dieringer, EdD, LAT, ATC
NATA President

⁶ Lin CY, Ball TJ, Gentile NL, McDonald VF, Humbert AT. Associations Between Physical Activity Vital Sign in Patients and Health Care Utilization in a Health Care System, 2018–2020. *Journal of Physical Activity and Health*. Published online December 08, 2022. doi:10.1123/jpah.2022-0266