**CMS Data Element Library HITWG Comments on the** [**ONC 2018 Interoperability Standards Advisory**](https://www.healthit.gov/isa/sites/default/files/2018%20ISA%20Reference%20Edition.pdf) **(ISA)**

**August 27, 2018**

The Centers for Medicare and Medicaid (CMS) Data Element Library (DEL), Health Information Technology Workgroup (HITWG) evaluated the [2018 Interoperability Standards Advisory](https://www.healthit.gov/isa/sites/default/files/2018%20ISA%20Reference%20Edition.pdf) and offer the following comments based on an analysis against the data classes and related health IT vocabulary codes for the federally required post-acute care (PAC) assessment instruments.

***Section I – Vocabulary/Code Sets/Terminology* Standards and Implementation Specifications**

* **I-D: Functional Status/Disability**
	+ ***Recommendation:*** The CMS DEL HITWG recommends referencing the CMS DEL for the Functional Abilities and Goals Assessment (Prior Functioning and Everyday Activities, Self-Care, Mobility). The assessment is completed (in full or in part) on patients receiving post-acute care in Inpatient Rehabilitation Facilities (IRF), Skilled Nursing Facilities (SNF) and Nursing Facilities (NF), Medicare Home Health Agencies (HHA), and Long-Term Care Hospitals (LTCH). Items in the assessment are also used the Functional Assessment Standardized Items (FASI) tool used for patients served by home and community-based service providers.
	+ ***Other Comments:*** There is an opportunity for the ISA to further define the areas of functional status include in this section (e.g. Activities of Daily Living (ADLs), Instrumental Activities of Daily Living (IADLs), Mobility, Mental/Cognitive, Hearing/Speech/Vision).
		- In the past cognitive status was included in functional status in a Consolidated Clinical Document Architecture (C-CDA) document. It has recently been moved from functional status to a separate area and the name changed to mental status.
		- If mental status is not included in this section, then it appears to be a gap in the ISA.
		- Similar to mental/cognitive status, it is not clear if hearing, speech and vision status is considered part of functional status or if it is a gap in the ISA.
* **I-L: Nursing - Representing Clinical/Nursing Assessments**
	+ ***Recommendation:*** The CMS DEL HITWG recommends including the CMS post-acute care clinical assessments and referencing the CMS DEL for related LOINC and SNOMED codes. CMS assessments include:
		- [Resident Assessment Instrument (RAI) Minimum Data Set (MDS) v.1.16](https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/NursingHomeQualityInits/NHQIMDS30TechnicalInformation.html) – Skilled Nursing Facilities, Nursing Homes, and Swing Bed Facilities
		- [Outcome and Assessment Information Set (OASIS)- version C2](https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/HomeHealthQualityInits/OASIS-Data-Sets.html) – Home Health Agencies
		- [Inpatient Rehabilitation Facility Patient Assessment Instrument (IRF-PAI) v.2.0](https://www.cms.gov/Medicare/Medicare-Fee-for-Service-Payment/InpatientRehabFacPPS/IRFPAI.html) - Inpatient Rehabilitation Facilities
		- [Long-Term Care Hospital Continuity Assessment Record & Evaluation (CARE) Data Set (LCDS) v.4.0](https://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/LTCH-Quality-Reporting/LTCH-CARE-Data-Set-and-LTCH-QRP-Manual.html) – Long-Term Care Facilities
	+ ***Other Comments:***
		- Each clinical assessment includes a subset of assessment items organized by clinical categories which could be referenced in individually in this section or in other sections of the ISA (e.g. see comments on functional status).
		- The HITWG recommends updating the category name from “Nursing” to “Clinical” or Clinical/Nursing to reflect that the category is not limited to only nursing but other clinical disciplines as well.
		- The Section on Limitations, Dependencies, and Preconditions for Consideration appears to have a missing reference to Systematized Nomenclature of Medicine – Clinical Terms (SNOMED CT). (see below)



* **I-S: Social, Psychological, and Behavioral Data:**
	+ **General Comment for this Section**
		- ***Recommendation:*** The DEL HITWG recommends that this section include an assessment of behavioral symptoms (physical behaviors directed toward others, verbal behaviors directed toward others, and other types of behaviors including self-harm). The CMS DEL MDS v1.16 assessment for Behavioral Symptoms includes this type of assessment and could be referenced if there was an appropriate section designated for this type of behavioral data.
	+ **Representing Depression**
		- ***Recommendation:***
			* The DEL HITWG recommends that the Logical Observation Identifiers Names and Codes (LOINC) codes referenced in this section be updated to reflect the latest codes for the Patient Health Questionnaire-2 (PHQ-2) and Patient Health Questionnaire-9 (PHQ-9). CMS Assessments include the PHQ-2 and PHQ-9 and reference different LOINC codes. The HITWG has verified with Regenstrief Institute (RI) that the codes in the ISA should be updated.