



STATE OF WASHINGTON
DEPARTMENT OF HEALTH

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May 2, 2022

The Honorable Micky Tripathi, Ph.D. M.P.P.
National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
Hubert H. Humphrey Building, Room 7009A
200 Independence Avenue, SW
Washington, DC 20201

RE: Request for Comments, “2021 Standards Version Advancement Process (SVAP)”

Dear Dr. Tripathi:

On behalf of the Washington State Department of Health (DOH), I write to provide comments to the Office of the National Coordinator for Health Information Technology (ONC) on the 2021 Standards Version Advancement Process (SVAP).

The Washington State Department of Health has core responsibilities for the preservation of public health, monitoring health care costs, the maintenance of minimal standards for quality in health care delivery, and the general oversight and planning for all the state's activities as they relate to the health of its citizenry. [RCW 43.70.005](#). Our programs and services help prevent illness and injury, promote healthy places to live and work, provide information to help people make good health decisions and ensure our state is prepared for emergencies.

To accomplish our purpose as a public health agency, DOH has many programs that receive and send data to clinical data partners through their health information technology systems. DOH strives to make transacting data with public health as seamless and efficient as possible for health care providers. Our agency has embraced the interoperability standards set forth by ONC for public health measures and believes this work has been essential to make exchange with public health more efficient for both healthcare providers and public health agencies. DOH asks that ONC consider the vital work that public health carries out when looking at revising or adding new standards that impact public health.

DOH’s specific comments for SVAP are listed below based on the information posted to <https://www.healthit.gov/isa/standards-version-advancement-process>.

- [HL7 CDA® R2 Implementation Guide: National Health Care Surveys \(NHCS\), R1 STU Release 3 - US Realm \(Available 3/12/2021\)](#) – DOH supports this update for NHCS to support reporting to public health agencies. It is important to have a standardized format to represent ambulatory, inpatient, and outpatient healthcare data collected by the CDC. This data is valuable for use by health policy makers, health

- service researchers, epidemiologists and health care industry and other interested parties.
- United States Core Data for Interoperability (USCDI), Version 1, July 2020 Errata New version under consideration United States Core Data for Interoperability (USCDI), Version 2, July 2021 DOH strongly supports including USCDI Version 2 in SVAP this year. Version 2 will continue to advance important health equity work via key patient demographic data.
 - HL7 FHIR® US Core Implementation Guide STU 4.0.0, June 28, 2021 – DOH supports the inclusion of this guide to help define the minimum set of constraints on the FHIR resources to create the US Core Profiles. Continued work to advance FHIR is essential to national interoperability.
 - HL7 FHIR (v4.0.1) Situational Awareness for Novel Epidemic Response (SANER) IG 0.1.0 Continuous Build – DOH requests that SANER be added to this year’s SVAP (<https://www.healthit.gov/isa/covid-19>). DOH believes SANER to be critical to address future epidemics, pandemics and emergencies by having an open-source effort to streamline and accelerate real-time transmission of de-identified data among health care facilities, critical infrastructure, and governmental response authorities during public health emergencies and disasters. By adding this to SVAP, ONC can promote getting this important standard implemented more quickly by developers of CEHRT.

DOH strongly supports the SVAP process as we believe it can help push forward important collection of SDOH data as well as other improvements. Federal support for public health reporting must remain strong. DOH appreciates ONC work to support a strong public health surveillance to protect the public; and reinforce the public health system as a partner across clinical systems to support providers in the application of evidence-based practices. DOH looks forward to partnering with HHS to further this important work. Thank you for the opportunity to provide comments on this edition.

Sincerely,



Bryant Thomas Karras M.D.
Chief Medical Informatics Officer
Office of Innovation and Technology

Cc: Les Becker, Deputy Secretary for Innovation