TENNESSEE DEPARTMENT OF HEALTH (TDH)
Office of Informatics Analytics (OIA)

April 29, 2022

Micky Tripathi, PhD
National Coordinator for Health IT
Office of the National Coordinator for Health Information Technology
Department of Health and Human Services
330 C St SW, 7th Floor
Washington, DC 20201

RE: Draft USCDI Version 3

Dear Dr. Tripathi,

The Tennessee Department of Health (TDH) Office of Informatics and Analytics (TDH-OIA) appreciates the opportunity to share comments on Version 3 the United States Core Data for Interoperability Version 3 (USCDI v3). TDH is the primary public health agency responsible for public health in Tennessee. The department oversees eighty-nine rural county health departments and works closely with six metropolitan health departments under local governance to carry out the provision of public health services to people in Tennessee. Each county in Tennessee is served by a county health department providing direct and indirect services to Tennessee residents and visitors. TDH staff participates in many health care and health IT industry organizations, associations, workgroups, and task forces to ensure the needs of public health programs including those that conduct surveillance, outbreak investigations and event response, laboratory testing, and prevention of communicable and non-communicable diseases and conditions in Tennessee are heard.

The mission of the Tennessee Department of Health is to protect, promote and improve the health and prosperity of people in Tennessee. The TDH has a great deal of interest in the widespread adoption and use of nationally accepted standards and requirements that increase data sharing, improves timely reporting and accuracy, that enforces information sharing between the clinical sector and public health. TDH can appreciate ONC's effort for its development of the USCDI as the foundation of data elements and classes that all electronic health record technology should be able to collect, analyze and share between providers. Once broadly adopted, the USCDI will lead to improved interoperability and health data exchange, enabling better care coordination, improved health for patients and lower costs.

TDH-OIA strongly supports comments submitted by the Council of State and Territorial Epidemiologists (CSTE). Additionally, we offer for your consideration the following comments regarding medication data. We strongly recommend the data elements from the medication data class, listed in the table below, be included in USCDI v3. For TDH and other public health agencies, being able to exchange medication data is critical and is also included in HL7 CDA and FHIR eCR standards to specifically support the needs of public health. It is especially important for public health programs that use medication data for STI, HIV, and TB surveillance and case management, antimicrobial resistant pathogen infection surveillance and interventions, responding to the drug overdose epidemic, and other public health responses. TDH uses medication data to help more quickly verify that treatment is completed appropriately so that valuable public health resources and time can focus on other impactful public health

interventions. For eCR, medication data is used to trigger the sending of an electronic case report from healthcare facilities to TDH.

Data Class	Data Element	Recommended USCDI Level
Medications	Date Medication Administered	v3
Medications	Date Medication Prescribed	v3
Medications	Discharge Medications	v3
Medications	Medication Administered Code	v3
Medications	Medication Administration	v3
Medications	Medication Administration Dose	v3
Medications	Medication Administration Dose Units	v3
Medications	Medication Prescribed Code	v3
Medications	Medication Prescribed Dose	v3
Medications	Medication Prescribed Dose Units	v3
Medications	Medications Dispensed	v3

Again, TDH-OIA is appreciative of ONCs efforts and are thankful for the opportunity to comment. If there are any questions or concerns, please reach us at TDH.Informatics@tn.gov.

Sincerely,

Erin Holt Coyne

Erin Holt Coyne, MPH

Chief Public Health Informatics Officer, Director of Core Informatics

Office of Informatics and Analytics

Tennessee Department of Health