



STATE OF WASHINGTON

DEPARTMENT OF LABOR & INDUSTRIES

PO Box 44100 • Olympia, Washington 98504-4100

April 17, 2023

National Coordinator
Office of the National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
330 C Street SW, 7th Floor
Washington, DC 20201

RE: Draft U.S. Core Data for Interoperability (USCDI) version 4

Dear National Coordinator Tripathi:

The Washington State Department of Labor & Industries appreciates the opportunity to comment on USCDI version 4. The department provides coverage and manages care for over 3.5 million working Washingtonians. It is our mission to keep Washington safe and working, and we do so by partnering with health care providers and organizations throughout the United States. As a state-run workers' compensation program, we are national leaders in developing programs that support ill and injured workers. Over the last ten years, we have focused on developing Health Information Exchange transactions that allow for timely decision making and treatment. As we work to develop these tools, we have appreciated the federal guidelines that have standardized the information and allowed us to improve our coordination with our health care partners.

We want to ensure that every worker has access to high quality treatment in a timely manner. For this reason, we would like the committee to consider making these work related questions part of Level 1 data elements rather than Level 2 since that increases the integration of this information within electronic medical records systems. In addition, we propose adding a Workers' Compensation use case to USCDI+ so that those working on these data exchanges can locate the data elements they would use in a single area.

For USCDI we propose the following additions be included in the Level 1 Work section:

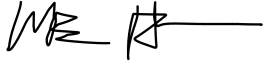
- **Description of Injury/Exposure:** a short description of the injury/illness the worker is reporting.
- **Job Title and Duties:** a short description of the workers' job title and main duties so that the provider can understand basic physical requirements.
- **Causation:** Is this condition due to a specific incident? Was the diagnosis caused by the patient's work? A key piece of information we need from the medical provider.
- **Work Status:** Will this injury/illness cause the worker to miss work? This question impacts the workers' health. Workers who are unable to return to work in some capacity within a few weeks are significantly more likely to become permanently disabled.

For the USCDI+ use case we propose the data elements above in addition to:

- Work Information as described in the current schema.
- Problems
- Date of Onset
- Job Classification
- Usual Occupation

We thank you for your attention to this important topic. We welcome your questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'MR', followed by a horizontal line extending to the right.

Michael Ratko
Assistant Director for Insurance Services