

9/17/2023

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: United States Core Data for Interoperability (USCDI) v5

Dr. Tripathi,

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit these comments relative to the annual review of the United States Core Data for Interoperability (USCDI). Representing more than 112,000 registered dietitian nutritionists (RDNs)¹, nutrition and dietetic technicians, registered (NDTRs), and advanced degree nutritionists, the Academy is the world’s largest association of food and nutrition professionals and is committed to a vision of a world where all people thrive through the transformative power of food and nutrition.

The Academy works through its Interoperability and Standards Committee (ISC) to engage national and international standards organizations that develop and harmonize health information technology standards to improve health information sharing and interoperability related to nutrition.

We respectfully offer the following comment on USCDI version 5.

Class: [Nutrition and Diet](#)

Data Elements:

- Oral Diet Type
- Oral Diet Fluid Consistency
- Oral Diet Texture Modifiers
- Oral Nutritional Supplement
- Enteral Nutrition Type
- Enteral Nutrition Volume
- Enteral Nutrition Rate
- Enteral Nutrition Frequency
- Enteral Nutrition Additive
- Enteral Nutrition Flush
- Eating/drinking assistive device
- Oral Diet Nutrient Modifiers

¹ The Academy approved the optional use of the credential “registered dietitian nutritionist (RDN)” by “registered dietitians (RDs)” to convey more accurately who they are and what they do as the nation’s food and nutrition experts. The RD and RDN credentials have identical meanings and legal trademark definitions.

The Academy recommends the inclusion of the Level 2 Class Nutrition and Diet and its data elements to USCDI version 5.

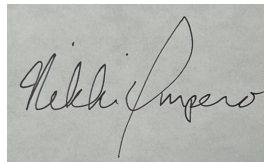
The Nutrition and Diet class and its data elements play a critical role in patient care. These elements are utilized daily in various care settings by providers and support clinicians, for example, the data element oral diet type is prescribed for every acute care patient upon admission if applicable. By including these data elements in USCDI, there will be a standardized way of recording and sharing nutrition and diet data, ensuring consistency across the healthcare spectrum, promoting interoperable health data exchange, and enhancing the ability to aggregate nutrition and diet-related data to improve patient safety and outcomes.

The Academy appreciates your consideration of these comments regarding the annual review of the United States Core Data for Interoperability. Please contact either Jeanne Blankenship at 312-899-1730 or by email at jblankenship@eatright.org or Michelle Ashafa at 312-899-4760 or mashafa@eatright.org with any questions or requests for additional information.

Sincerely,



Jeanne Blankenship, MS RDN
Vice President, Policy Initiatives and
Advocacy
Academy of Nutrition and Dietetics



Nicole Impero, RD, LDN
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Interoperability and Standards
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