



March 27, 2024

Submitted electronically at <https://www.healthit.gov/isa/united-states-core-data-interoperability-uscdi#uscdi-v4>

Micky Tripathi, PhD, MPP  
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: United States Core Data for Interoperability (USCDI) version 5 (v5)

Dear Dr. Tripathi,

ViiV Healthcare Company (ViiV) appreciates the opportunity to provide comments and feedback on data elements for inclusion into United States Core Data for Interoperability (USCDI) version 5 (v5).

ViiV is the only independent, global specialist company devoted exclusively to delivering advancements in human immunodeficiency virus (HIV) treatment and prevention to support the needs of people with HIV and those vulnerable to HIV. From its inception in 2009, ViiV has had a singular focus to improve the health and quality of life of people affected by this disease and has worked to address significant gaps and unmet needs in HIV care. In collaboration with the HIV community, ViiV remains committed to developing meaningful treatment advances, improving access to its HIV medicines, and supporting the HIV community to facilitate enhanced care and treatment.

**ViiV supports ONC's efforts to support health equity goals as it relates to interoperability for EHRs and data collection. Specifically, we applaud the regulation that requires health IT modules certifying patient demographics to be capable of exchanging Sexual Orientation and Gender Identity (SOGI) information, and Name to Use, Pronoun, and Sex Parameter for Clinical Use by 2026.**

An estimated 1.2 million people in the United States are living with HIV and at least thirteen percent are unaware that they have the virus.<sup>1</sup> Policies and systemic interventions that combat discrimination and stigma in healthcare are critical in promoting effective HIV medical care and HIV prevention efforts. HIV impacts certain populations at alarming rates of disparity. Although HIV can affect anyone, racial/ethnic minorities, and gay, bisexual, and other men who have sex with men (MSM) in the U.S. are more impacted than others. Populations disproportionately affected by HIV are also

---

<sup>1</sup> Centers for Disease Control and Prevention (CDC). Monitoring selected national HIV prevention and care objectives by using HIV surveillance data—United States and 6 dependent areas, 2019. HIV Surveillance Supplemental Report 2021;26(No. 2). <https://www.cdc.gov/hiv/pdf/library/reports/surveillance/cdc-hiv-surveillance-report-vol-26-no-2.pdf>. Published May 2021. Accessed March 26, 2024.

often affected by stigma due to their sex, sexual orientation, and gender identity, among other factors.<sup>2</sup>

ViiV encourages efforts to promote Sexual Orientation and Gender Identity (SOGI) data collection on an opt-out basis. Offering SOGI data options, and asking patients their preferred pronouns and name to use are important steps in advancing a health care environment free of stigma and discrimination. This also advances cultural competency in health care settings, and among healthcare providers.

Offering SOGI data options, preferred pronouns and name, and Sex Parameter for Clinical Use also help create an environment for improved sexual health discussions between providers and patients. SOGI data can provide important information for providers in understanding patient history and assist in clinical diagnosis of conditions like HIV. It also assists with identification of patients who might benefit from HIV prevention

**ViiV supports ONC's efforts to require health IT modules certifying patient demographics to be capable of exchanging Sexual Orientation and Gender Identity (SOGI) information, and Name to Use, Pronoun, and Sex Parameter for Clinical Use by 2026 as an important step in efforts to drive health equity across the US healthcare landscape.**

Please feel free to contact me at (770) 710-9620 or [carie.a.harter@viivhealthcare.com](mailto:carie.a.harter@viivhealthcare.com) should you have any questions.

**Sincerely,**

A handwritten signature in cursive script that reads "Carie Harter". The signature is written in dark ink on a light-colored, slightly textured background.

Carie Harter  
Senior Director, Government Relations  
ViiV Healthcare

---

<sup>2</sup> HIV.gov. Standing Up to Stigma. February 2020. <https://www.hiv.gov/hiv-basics/overview/making-a-difference/standing-up-to-stigma>. Accessed March 26, 2024.