

Interoperability Standards Advisory 2016 Public Comment Form

INSTRUCTIONS: ALL comments will be identified as **Critical, Substantive or Administrative**. Comments not marked will be considered Administrative.

Definitions:

Critical - - indicates non-concurrence with the document until the comment is satisfactorily resolved; convincing support for critical comments must be provided.

Substantive - - indicates that a section in the document appears to be or is potentially unnecessary, incorrect, misleading, confusing or inconsistent with other sections; requires convincing support.

Administrative - - corrects what appears to be a typographical, format or grammatical error.

All comments must have a complete **recommended change** with a **complete rationale** provided.

Section/ page no.	Level Critical/ Substantive/ Admin	Recommended Change	Rationale
N/A	Admin	The ISA is optional. Why don't you add a new column for each standard/implementation specification to identify whether it is a designated criteria for EHR Meaningful Use certification.	This would add value in terms of being able to cross-reference MU certification criteria and would help to promote standards adoption.
1A	Substantive	Please identify how the adoption level is calculated, i.e. what is the formula.	I would like to understand how the standards adoption level is being evaluated by ONC.
1A	Substantive	Section I-F Functional Status/Disability. What about the International Classification of Functioning, Disability and Health (ICF)? World Health Organization.	Towards a Common Language for Functioning, Disability and Health: ICF. Geneva 2002. Available at http://www3.who.int/icf/beginners/bg.pdf
1A	Substantive	Section I-G. Representing Patient Sexual Orientation.	What is this data element? I have not seen this field before?
II-G	Substantive	Images. What about the Consolidated Clinical Document Architecture (C-CDA) DIR? How are images references specified? What about transport?	We need more details here.

II-J	Substantive	Patient Preference/Consent	XUA = Cross Enterprise User Assertion Profile, not Cross Enterprise User Authorization as printed in the draft advisory.
Page 5.	Substantive	We suggest a better description about the term "Emerging Alternative". While it is detailed in a sentence or two within the table section, it is only mentioned briefly in the introductory text, at the bottom of Page 5.	We believe that it needs a more descriptive introductory statement, or alternatively a more detailed description in the table section, as to why the alternative has arisen, and precisely what is meant by "emerging". Without this, it might be assumed that the current best practice is inadequate, or about to be replaced, and that's not necessarily the case.
I-S	Substantive	Vital signs	If vital signs are recording directly from medical devices such as ie..vital sign machines, physiological monitors, will vitals also need to comply with the unique medical device standard by the FDA, as well as LOINC?

**Committer
Organization**

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