



The Office of the National Coordinator for
Health Information Technology
Health IT Advisory Committee

U.S. Core Data for Interoperability Task Force Preliminary Promotion Model Recommendations

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USCDI Task Force Charge: Data Element Promotion Model

- **Overarching Charge:** Review and provide feedback on the U.S. Core Data for Interoperability (USCDI) Data Element Promotion Model.
- **Specific Charge:** Provide recommendations on the following:
 - » Promotion Model Lifecycle for Submitted Data Elements
 - » Data Element Submission Information
 - » Data Element Promotion Criteria
- **Supplemental:** Discuss additional defining criteria as needed

Promotion Model Guidelines

- Any individual or entity may submit a Data Element to the USCDI process as well as contribute to a Data Element's promotion.
- Stakeholders will submit Data Elements for consideration as part of the USCDI Promotion Model.
 - » A Data Class with multiple Data Elements may be submitted, but each constituent Data Element will be individually evaluated for level placement and advancement.
 - » A Data Class may have Data Elements at different classification "levels."
 - » A single Data Element may be a Data Class in name as well (e.g., Immunizations).
- The Data Element information submitted for entry to the USCDI Promotion Process will determine whether the Data Element is classified as **Proposed**, Level 1 or Level 2. **Comments that are submitted but not yet reviewed are "unclassified". Once reviewed they become "Proposed" if they do not meet criteria for Levels 1 or 2.**

Promotion Model Guideline Recommendations

- No Data Element can proceed directly into the USCDI. To promote transparency, planning, and predictability a Data Element would need to be in Level 2 for at least one process cycle before promotion to USCDI.
- Data Elements that do not demonstrate advancement will be removed from the promotion process after specified periods of time.
- The USCDI Promotion Process guidelines and criteria will be transparent to the public.

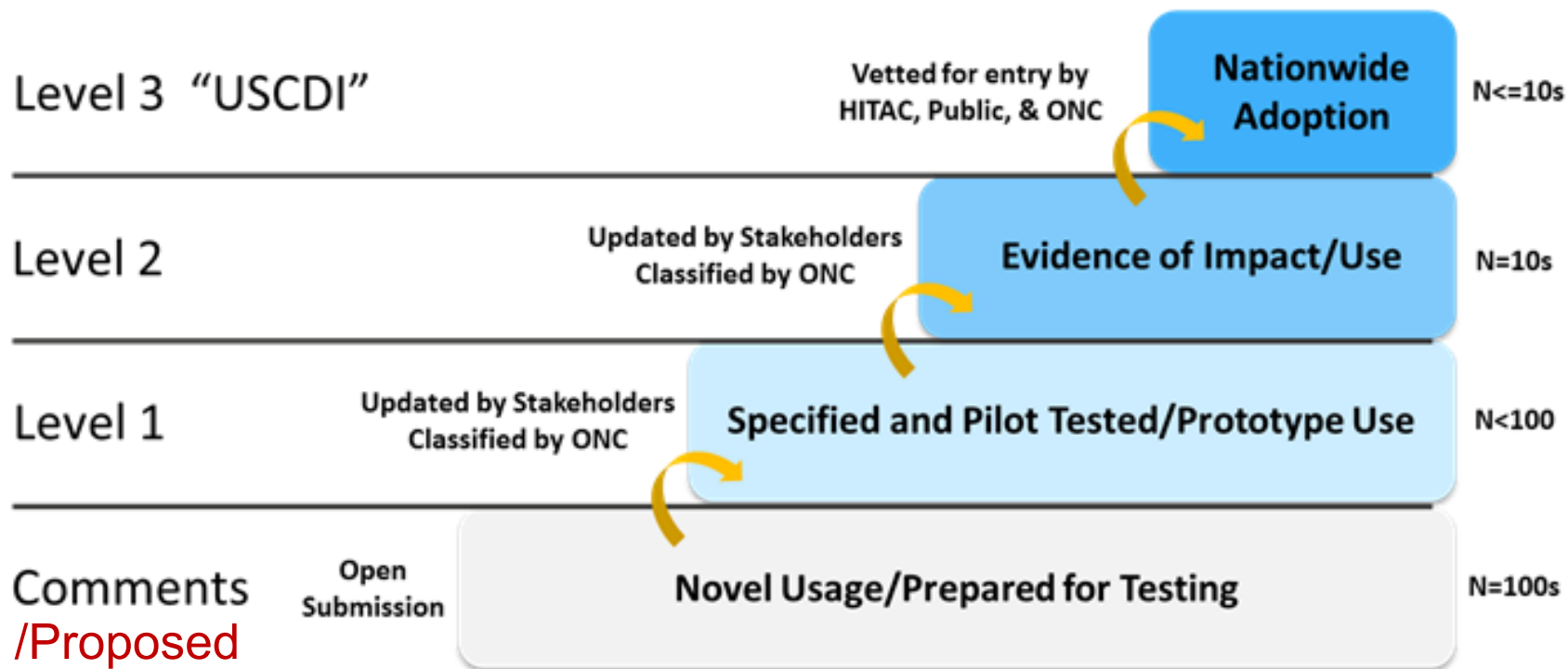
Promotion Model Lifecycle for Submitted Data Elements

- A “submission cycle” begins when ONC announces a new version of the USCDI
- A submission cycle ends at the end of the calendar year when the Data Element submission period closes
- Submitted Data Elements exist as “Comments” **until reviewed and “Proposed” after review** until they are classified into Level 1 or Level 2
- Proposed Data Elements will be removed if not classified into Level 1 or Level 2 within three submission cycles
 - » ONC will make the level classification decisions for each new submission
 - » If the submitter updates and resubmits the Data Element, the three-year cycle restarts
- Once classified into Level 1 or Level 2 by ONC, a Data Element has up to three submission cycles to be promoted to the next level (Level 1 to 2, or Level 2 to USCDI)
 - » ONC retains discretion to keep a Data Element in Level 2 for longer than three submission cycles

Promotion Lifecycle for Submitted Data Elements

- If a Data Element is removed due to lack of progress, it will be archived in a separate section on the USCDI webpage
 - » To be reintroduced into the promotion process, the Data Element must be resubmitted
- After a Data Element's level classification has been published, a submitter may request information on the classification decision

USCDI Promotion Model Lifecycle for Submitted Data Elements



Recommendations: Promotion Model Lifecycle (1/4)

- A “submission cycle” begins when ONC announces a new version of the USCDI, which marks the beginning of a new Data Element submission period. A submission cycle ends at the end of the calendar year when the Data Element submission period closes.
- Submitted Data Elements exist as “Comments” until they are classified into Level 1 or Level 2.
- **Recommendation:** The task force supports the concept that anyone can submit a data element via an open comment process. The TF suggests that data elements submitted for review, currently labelled as “Comments” become “Proposed” data elements once reviewed and until classified as Level 1 or Level 2.

Promotion Model Lifecycle (2/4)

- Data Elements not classified into Level 1 or Level 2 have three submission cycles from the ONC final decision period to remain at the comment level before they are removed.
 - » Data Element submissions may be **modified**/updated and resubmitted to be reviewed again. If the submitter updates and resubmits the Data Element, the three-year cycle restarts.
 - » ONC will make the level classification decisions for each new submission.
- **Recommendation:** Clarify how proposals should be modified, updated, and/or resubmitted.

Promotion Model Lifecycle (3/4)

- Once classified into Level 1 or Level 2 by ONC, a Data Element has up to three submission cycles to be promoted to ~~the~~ its next level (from Level 1 to Level 2, or Level 2 to USCDI). ONC retains discretion to keep a Data Element in Level 2 for longer than three submission cycles.
 - » **Recommendation:** Put a process in place to group/merge related data elements. When possible, tag data elements as belonging to a data class that already exists in USCDI and/or as part of a newly proposed data class.
 - **Note:** The USCDI process operates at the level of the data element and not at the level of the data class. Data classes may advance to incorporate more data elements or new data classes can be proposed (e.g., SDOH).
- When a Data Element is removed from the process due to lack of progress, it will be archived in a separate section on the USCDI webpage. To be ~~reinserted~~ reintroduced into the promotion process, the Data Element must be resubmitted.
 - » **Recommendation:** Data elements are listed as “proposed” when ONC determines that they are not Level 1 or Level 2. Data elements may be marked/tagged as inactive after a period of 5 (?) years but should remain in the proposed category.
 - » **Recommendation:** Data elements in the “proposed” category should be grouped into classes when possible.

Promotion Model Lifecycle (4/4)

- After a Data Element's level classification has been published, a submitter may request to be debriefed on the classification decision.
 - » **Recommendation:** This should be public so that all interested stakeholders understand the classification decision and include the “grading” criteria that lead to the decision as well as justification and exchange(s) with submitter.

Data Element Submissions Information

- The following fields would need to be addressed for a Data Element submission to be considered for level classification (submitter contact information would be collected separately):
 1. Data Element name and description.
 2. Why should this Data Element be captured and available for exchange nationwide? Provide applicable use case(s) with a focus on the following: specific setting (e.g., outpatient/ambulatory or inpatient), specialty area, and/or federal/state/local regulatory requirement.
 3. Do systems currently capture this Data Element? If yes, please provide details.
 4. Do standards exist to represent and exchange this Data Element? If yes, please provide.
 5. Please describe any connect-a-thon testing, pilots, or production use of the Data Element.
 6. (Not factored into classification) Is there any other information you would like to provide? For example, do you have partners to support development of this Data Element? Are you providing resources to ensure the Data Element will be implemented?

Data Element Submission Information (1/4)

- Data Element **proposed** name and description.
 - » **Recommendation:** ONC should review the name and description of data elements that are submitted. This includes a review of all submitted data elements to group similar submissions and refine them as necessary prior to assigning a level. This may include refining the name and/or description before a data element is assigned to a level.
 - » **Recommendation:** Add an additional requirement for the submitter to identify related data elements already submitted whether Proposed, Level 1 or Level 2..
 - » **Recommendation:** As an optional field, indicate an existing or propose a new data class for the data element(s).

Data Element Submission Information (2/4)

- Why should this Data Element be captured and available for exchange nationwide? Provide applicable use case(s) with a focus on the following: specific **care** setting (e.g., **home care**, **post-acute**, outpatient/ambulatory or inpatient), specialty area, and/or federal/state/local regulatory requirement.
- **Recommendation:** Expand the list of applicable use case(s) to include all stakeholders needed to achieve the quadruple aim (e.g., public health, research, population health)
- **Recommendation:** Expand upon the criteria/guidelines for a submitter to provide adequate information to support the data element.

Data Element Submission Information (3/3)

- Do systems currently capture this Data Element? If yes, please provide details.
 - » **Recommendation:** Include details of the structured capture of the data
- Do standards exist to represent and exchange this Data Element? If yes, please provide.
 - » **Recommendation:** Point to ISA
- Please describe any connect-a-thon testing, pilots, or production use of the Data Element.
- (Not factored into classification) Is there any other information you would like to provide? For example, do you have partners to support development of this Data Element? Are you providing resources to ensure the Data Element will be implemented?
 - » **Recommendation:** Include letters of support and/or a method to endorse a data element and identify level of commitment to advance data element(s).

Additional Discussion

- Identified gaps:
 - » A national health information strategy based on an inventory of data needs of parties whose participation is required to achieve the quadruple aim.
 - » A mechanism to advance strategically important data elements and classes that require market incentives through the USCDI process.
 - » **Recommendation:** Address concerns that the current process disadvantages entities with little experience developing and testing standards and those with limited resources to pursue data element advancement. The market voice is appropriate but is not likely to address all the data needs required to create a learning health care system and achieve the quadruple aim. How can a “strategic” vision of data element advancement mesh with a market driven vision?

Additional Discussion

- Missing Functions
 - » Identify the health information required by all entities essential to achieve the quadruple aim
 - » Prioritize data elements and classes based on their value to achieving the quadruple aim
 - » Create a strategic plan to move essential data elements through the USCDI process
 - » Identify strategically important data elements and classes that require incentives for market engagement to advance from “proposed” to Level 1
 - » Advocate for and provide incentives for proposed data classes that fill a strategic requirement to move them from “proposed” to Level 1 in the absence of sufficient market interest.
 - Analogy/perspective: “Orphan” drugs have high value to limited groups but not sufficient appeal for the “market” to adopt them. Similarly, there are “orphan” data elements and data classes with strategic importance but without broad market support.

Data Element Promotion Criteria

- Next topic for TF discussion starting this week
- Data elements promoted to USCDI must have a high degree of technical readiness, but the process cannot be so onerous that it becomes a barrier for advancement



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Thank you



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