



November 20, 2017

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

Submitted electronically at: <https://www.healthit.gov/isa/section-vi-questions-and-requests-stakeholder-feedback>

Dear Dr. Rucker,

The [Alliance for Nursing Informatics](#) (ANI) advances nursing informatics leadership, practice, education, policy and research through a unified voice of nursing informatics organizations. ANI has reviewed the Office of the National Coordinator for Health IT (ONC)'s [2017 Interoperability Standards Advisory](#) (ISA). In that spirit, we offer our comments as nursing stakeholders to inform the 2018 ISA “reference edition” publication.

ANI responded to the 2016 ISA and prior 2017 ISA, which recommended the inclusion of new interoperability standards related to nursing concepts. We would like to thank ONC for several modifications to the 2017 ISA aligned with our prior comments. In particular, we note that the appropriate standards are now specified for nursing observations, observation values, and validated scales, and we commend the recognition of the Nursing Problem List Subset of SNOMED CT for representing patient problems for nursing. Our recommendations to use the term ‘mapped’ instead of ‘converted’ in reference to other ANA-recognized terminologies was successfully incorporated, with one exception. Please also change the term ‘converted’ to ‘mapped’ in the section Representing Patient Problems for Nursing.

To build on our previous comments related to Social, Psychological, and Behavioral Data, we recognize the purpose of the ISA is targeted at the broader community and encourage its use across other federal agency programs. For example, the recent CMS CMMI award for accountable health communities uses a

modified framework for five social determinants of health, which is a subset of the 8 domains recognized in the ISA. ANI recommends harmonization of these standards across other federal programs.

We are pleased to see and ready to support the new subsection related to consumer access/exchange of health information for these four initial interoperability needs:

- Push patient generated health data into integrated EHRs
- Patient exchanging secure messages with care providers
- View, download, and transmit data from EHRs
- Remote patient authorization and submission of EHR data for research

We recognize the vast resources that are required for interoperability work. Please consider ANI as one of several forums and resources to engage with to actively advance interoperability. We appreciate the opportunity to contribute to the conversation on these important Interoperability Standards and their implementation, particularly as it relates to nursing and consumer health data.

Sincerely,



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The [Alliance for Nursing Informatics](http://www.allianceni.org) (ANI), cosponsored by AMIA & HIMSS, advances nursing informatics leadership, practice, education, policy and research through a unified voice of nursing informatics organizations. We transform health and healthcare through nursing informatics and innovation. ANI is a collaboration of organizations that represents more than 5,000 nurse informaticists and brings together 25 distinct nursing informatics groups globally. ANI crosses academia, practice, industry, and nursing specialty boundaries and works in collaboration with the more than 3 million nurses in practice today.