



Health Policy and Analytics Division
Office of Health Information Technology

Kate Brown, Governor



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Oregon Health Authority’s comments on ONC’s 2021 Interoperability Standards Advisory

Dear National Coordinator Tripathi,

Thank you for soliciting comments on the Office of the National Coordinator for Health Information Technology’s (ONC’s) Interoperability Standards Advisory (ISA) update for 2021. We applaud ONC for prioritizing the advancement of public health data standards in an iterative and consensus building process. The ISA continues to serve as a helpful list for the industry and those working to further interoperability.

The Oregon Health Authority’s (OHA) Office of Health Information Technology (OHIT) was established in 2011 as a part of the state’s health agency to support the adoption of electronic health records, the secure exchange of health information, and supporting meaningful use initiatives in the state. OHIT is a resource for both state programs and other public and private users of health information, providing planning, coordination, policy analysis and the development of public/private partnerships to further health IT in Oregon. Health IT is a key part of Oregon’s efforts to create a system of better health, better care and lower cost for all Oregonians.

Oregon has made significant progress in promoting the collection of social determinants of health data (SDOH), and we appreciate ONC’s commitment to identifying and promulgating additional data elements related to social services and the structural barriers that impact health. We look forward to seeing additional standards included in future iterations of the ISA, and to further reconciliation of national and state standards, particularly related to SDOH.

Race, Ethnicity, Language, and Disability

Section	Area	Comment/Recommendation
Vocabulary/ code set/ Terminology	Representing Patient Race and Ethnicity	Oregon has implemented standards for the collection of Race, Ethnicity, Disability, and Language (REALD). State legislation in 2013 (HB 2134) required OHA and the Oregon Department of Human Services (ODHS) to develop standards in all programs that collect, record, or report demographic data. It is critical to collect these data in a consistent and standardized manner to assess how racism impacts community and individual health. While we aim to align state standards to national standards where possible, specific to race and ethnicity, the CDC v1.0

Section	Area	Comment/Recommendation
		standard is not inclusive enough and is missing two races that are collected, recorded, and reported in Oregon – Somali and Slavic. We are unclear on the pathway to recommend changes to the CDC standard and if approved the time for the standard to be updated. We encourage ONC to deploy a clear path and forum for states to use when updates to national standards for demographics data are needed.

Additional Social Determinants of Health

Section	Area	Comment/Recommendation
Vocabulary/ code set/ Terminology	Social, Psychologic al and Behavioral Data	Oregon is pursuing multiple approaches to address unmet needs related to SDOH. We support the inclusion of standards for representing housing insecurity, representing food insecurity, and representing transportation insecurity. Although PRAPARE is one commonly used screening tool, other validated tools also are in widespread use. We encourage the inclusion of coding for additional screening tools as available, building on the work of the Gravity Project.

Thank you for the opportunity to provide comments on the ISA. Should you have any questions or if we can be of assistance, please contact me at 503-428-4751 or Susan.Otter@dhsoha.state.or.us.



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