

October 2, 2023

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Dr. Tripathi,

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit these comments relative to the annual review of the Interoperability Standards Advisory (ISA). Representing more than 112,000 registered dietitian nutritionists (RDNs)¹, nutrition and dietetic technicians, registered (NDTRs), and advanced degree nutritionists, the Academy is the world’s largest association of food and nutrition professionals and is committed to a vision of a world where all people thrive through the transformative power of food and nutrition. The Academy works through its Interoperability and Standards Committee (ISC) to engage national and international standards organizations that develop and harmonize health information technology standards to improve health information sharing and interoperability related to nutrition. We respectfully offer the following feedback on ISA 2023.

Section: Vocabulary/Code Set/Terminology

DIETARY AND NUTRITIONAL NEEDS > Interoperability Need: Representing Nutrition Assessment, Diagnosis, Interventions and Monitoring/Evaluation

The Academy recommends the following:

- Modify the type, standards process maturity, and the test tool link for *HL7 FHIR Nutrition Intake Resource* and *HL7 FHIR Nutrition Product Resource* in the table. The type for both recommended is an Emerging Standard rather than an Emerging Implementation Specification. The standards process maturity for both is Balloted Draft. The test tool link suggested for both is <https://confluence.hl7.org/display/FHIR/FHIR+Tools+Registry>.

¹ The Academy approved the optional use of the credential “registered dietitian nutritionist (RDN)” by “registered dietitians (RDs)” to convey more accurately who they are and what they do as the nation’s food and nutrition experts. The RD and RDN credentials have identical meanings and legal trademark definitions.

- Under Limitations, Dependencies, and Preconditions for Consideration, there are three recommendations:
 - Move the value set Nutrition Diagnosis Grouping (2.16.840.1.113762.1.4.1095.85) to under the Applicable Value Set(s) and Starter Set(s) column as this starter set contains terminology relating to diagnoses consistent with the name of the interoperability need and update the link to <https://vsac.nlm.nih.gov/valueset/expansions?pr=all&rel=Latest&q=2.16.840.1.113762.1.4.1095.85>.
 - Consider adding the following statement—Please see the Interoperability Need: Representing Patient Allergies and Intolerances; Food Substances since food substance allergy and intolerances are considered when formulating nutrition care to meet dietary and nutritional needs.
 - Consider verifying the status of Food insecurity data sets through The Gravity Project as we believe this work is complete rather than underway.

Under Applicable Value Set(s) and Starter Set(s), modify the links for the value sets:

- Food and Nutrient Delivery SNOMED CT U.S. Edition (2.16.840.1.113762.1.4.1095.2)
<https://vsac.nlm.nih.gov/valueset/expansions?pr=all&rel=Latest&q=2.16.840.1.113762.1.4.1095.2>
- Food and Nutrition Related History LOINC (2.16.840.1.113762.1.4.1095.78)
<https://vsac.nlm.nih.gov/valueset/expansions?pr=all&rel=Latest&q=2.16.840.1.113762.1.4.1095.78>
- Food and Nutrition Related History SNOMED CT U.S. Edition (2.16.840.1.113762.1.4.1095.84)
<https://vsac.nlm.nih.gov/valueset/expansions?pr=all&rel=Latest&q=2.16.840.1.113762.1.4.1095.84>

Section: Content/Structure

DIET AND NUTRITION > Interoperability Need: Exchanging Diet and Nutrition Orders Across the Continuum of Care

The Academy recommends:

- Modify the standards process maturity and the test tool link for *HL7 FHIR Nutrition Intake Resource* and *HL7 FHIR Nutrition Product Resource* in the table. The standards process maturity for both is Balloted Draft. The test tool link suggested for both is <https://confluence.hl7.org/display/FHIR/FHIR+Tools+Registry>.

The Academy appreciates your consideration of these comments regarding the annual review of the Interoperability Standards Advisory. Please contact either Jeanne Blankenship at 312-899-1730 or by email at jblankenship@eatright.org or Michelle Ashafa at 312-899-4760 or mashafa@eatright.org with any questions or requests for additional information.

Sincerely,



Jeanne Blankenship, MS RDN
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Michelle Ashafa, RD, LDN, CAPM, CSM
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