

October 1, 2018

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

Re: Representing Patient Tobacco Use (Smoking Status)

Dear Colleagues,

The American Association for Cancer Research (AACR), with over 40,000 members, is the oldest and largest scientific organization in the world dedicated to the prevention and cure of cancer through research, education, communication, and collaboration. We appreciate the opportunity to provide input on the Interoperability Standards Advisory (ISA) process for representing patient tobacco use.

The AACR commends the Office of the National Coordinator for Health Information Technology (ONC) on their commitment to ensuring the ISA process facilitates interoperability for clinical, public health, and research purposes. It is our hope that smoking status can be more documented in Electronic Health Records (EHR) in a way that provides more consistency to allow for interoperability and streamlines categories to reduce confusion and improve providers' workflow.

One major concern with the Systematized Nomenclature of Medicine Clinical Terms (SNOMED CT) EHR smoking status classifications is that the categories are open to interpretation and are not mutually exclusive. The overlap in smoking status classifications causes confusion at the point of care where smoking status is documented. The current value set includes:

Current every day smoker
Current some day smoker
Former smoker
Never smoker
Smoker, current status unknown
Unknown if ever smoked
Heavy tobacco smoker
Light tobacco smoker

The overlap in values, lack of definitions for categories that are open to interpretation (e.g., light and heavy smoker), and risk of different interpretations of the record between different healthcare settings reduces the potential for tobacco use data to be organized, queried, and analyzed for the benefit of individuals, institutions, and populations.

To address overlap and interpretation challenges, we propose ONC address the following through the ISA process:

- 1. Simplify the smoking status choices/classifications.**
- 2. Remove overlapping smoking status classifications.**

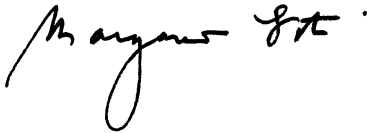
We recommend adoption of the following simplified categories:

Current Every Day Smoker
Current Some Day Smoker
Former Smoker
Never Smoker
Smoking Status Unknown

Furthermore, it would be advantageous to be able to capture use of other tobacco products (e.g. e-cigarettes), as well as quit date for former tobacco users.

Thank you for considering our input on this important issue. These comments are based on careful discussion by the AACR's Tobacco and Cancer Subcommittee (roster attached) and are approved by the AACR's CEO and Chairs of the Tobacco and Cancer Subcommittee and Science Policy and Government Affairs Committee. If the AACR can provide any additional information or assistance to ONC, please do not hesitate to contact Nicole Boschi, PhD, Senior Science Policy Analyst, at nicole.boschi@aacr.org.

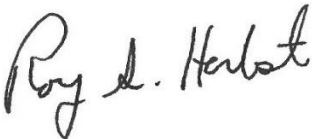
Sincerely,



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