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November 6, 2020  
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Dear Sir or Madam,

Cerner Corporation, a leading supplier of electronic health record, clinical and revenue cycle information systems appreciate the opportunity to submit comments on certain of the provisions of the current standards approved by the National Coordinator during this open comment period in the Standards Version Advancement Process. We offer comments on the individual standards/implementation specifications outlined below.

Cerner Corporation hopes these comments will be of value to ONC in considering possible update to any of the current standards/implementation specifications. We are happy to help clarify any of the comments should ONC wish to pursue any such conversations with us during the period of public comment review.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Travis', is written over a light blue horizontal line.

John Travis  
Vice President and Regulatory Strategy Executive  
Cerner Corporation

## **HL7 Implementation Guide for CDA® Release 2: National Health Care Surveys (NHCS), Release 1 - US Realm, HL7 Draft Standard for Trial Use, Volume 1 - Introductory Material, December 2014**

### **§ 170.315(f)(7) - Transmission to public health agencies — health care surveys**

We acknowledge the availability of three [1] new Implementation Guides. We suggest adopting HL7 CDA® R2 Implementation Guide: National Health Care Surveys (NHCS), Release 1, DSTU Release 1.2 – US Realm to maintain par with current reporting requirements. We understand the CDC is beginning to look at HL7 CDA® R2 Implementation Guide: National Health Care Surveys (NHCS), R1 STU Release 3 - US Realm - 2016 and reached out to various vendors to get feedback on using this latest version in Real World Testing. We suggest it is too early to include this latest version in SVAP considering its readiness for use, time to adopt and then include in real world testing in CDC's proposed 2021-time window. We suggest that SVAP 2021 provides a more realistic target to include the latest version. We recommend not including HL7 CDA® R2 Implementation Guide: National Health Care Surveys (NHCS), Release 1, STU Release 2 – US Realm considering CDC's focus on the latest version.

[1]

HL7 CDA® R2 Implementation Guide: National Health Care Surveys (NHCS), Release 1, DSTU Release 1.2 – US Realm

HL7 CDA® R2 Implementation Guide: National Health Care Surveys (NHCS), Release 1, STU Release 2 – US Realm

HL7 CDA® R2 Implementation Guide: National Health Care Surveys (NHCS), R1 STU Release 3 - US Realm – 2016