



January 21, 2021

To: The Honorable Donald Rucker, M.D.  
National Coordinator for Health Information Technology  
U.S. Department of Health and Human Services  
330 C Street SW, 7th Floor  
Washington, D.C. 20201  
By electronic submission via the [ONC portal](#)

Subject: Support of the Gravity Project's Submissions to Include Social Determinants of Health in the U.S. Core Data for Interoperability, Version 2

Dear National Coordinator Rucker:

We are writing to you to express Virginia Mason Franciscan Health's support for the Gravity Project's proposals to add a new data class, Social Determinants of Health (SDOH), to U.S. Core Data for Interoperability (USCDI) Version 2.

The wholesale support among the Gravity Project's 1,200+ diverse collaborators nationwide illustrates the deep need for, and the immediate value of, collecting and coding SDOH data for interoperable exchange and care provision. If adopted, either of their two recommended approaches – organized by domain or organized by SDOH activities in clinical care – would unquestionably help us to better document patient needs; identify potential health disparities and inequities among our patient populations; develop and track the performance of interventions aimed at addressing patients' unmet needs; and advance our interoperability objectives both within our multi-facility system and the broader healthcare provider community.

As such, we wholeheartedly support the Gravity Project's proposals to implement an essential framework for standardized capture and exchange of SDOH data elements, and we hope to see their recommendations adopted in the upcoming USCDI v2 release.

Sincerely,

Handwritten signature of Charleen Tachibana in black ink.

Charleen Tachibana, DNP, RN  
SVP, Chief Quality, Safety and  
Patient Experience Officer  
Virginia Mason Franciscan Health

Handwritten signature of Ellen Wiegand in blue ink.

Ellen Wiegand, MBA  
VP, Divisional Chief Information Officer  
Pacific Northwest Division  
Virginia Mason Franciscan Health

