Proposed comments related to USCDI on behalf of the LOINC Document Ontology Subcommittee

Comments related to existing Clinical Notes data elements in USCDI v1

- Please review comments in the context of the USCDI v1 Clinical Notes page, on which they will be submitted as errata (https://www.healthit.gov/isa/uscdi-data/clinical-notes#uscdi-v1)

1. The LOINC Document Ontology Subcommittee recommends adding the following explanatory text below the Clinical Notes header, following the existing explanatory text:

   “LOINC document codes represent expected collections of information regardless of format (e.g., structured versus unstructured, electronic format versus PDF document). For each note type, there is a generic LOINC concept as well as more specific concepts that vary by setting, specialty, etc. In most clinical situations, use of a more specific code is encouraged.”

2. The LOINC Document Ontology Subcommittee recommends adding information about how to access the value set of more specific LOINC terms available for each note type to the Applicable Standard(s) column for each note type. The Regenstrief LOINC team can provide FHIR ValueSets with associated OIDs and/or webpages with downloadable content for each note type. Both of these resources would include the same set of LOINC terms. These resources do not exist yet but can easily be created if approved as additions to the USCDI. The benefit of hosting these resources on the LOINC website or providing them via LOINC FHIR terminology services compared to VSAC or other value set repositories is that the resources will be updated automatically with every LOINC release and would not require a separate process.

3. The LOINC Document Ontology Subcommittee recommends removing the 3 rows for Laboratory narrative, Pathology narrative, and Imaging narrative. These three concepts represent narrative text from Clinical Reports, which capture information related to a lab test or imaging procedure (i.e., in response to an “order”) versus Clinical Notes, which are written by providers during the course of providing clinical care, and not in response to an order.

New data elements for consideration in USCDI v2

- To be submitted via ONDEC

1. See the ONDEC Submission Prep sheet: USCDI-ONDEC-Submission-Form-Prep-Sheet-ClinicalNotes data elements.docx
2. See the ONDEC Submission Prep sheet: USCDI-ONDEC-Submission-Form-Prep-Sheet-Imaging data elements.docx