February 16, 2018

Don Rucker, MD
National Coordinator for Health Information Technology
Office of the National Coordinator for Health Information Technology
Department of Health and Human Services
330 C St SW
Floor 7
Washington, DC 20201

Submitted Electronically: exchangeframework@hhs.gov

Re: Draft Trusted Exchange Framework

Dear Dr. Rucker,

On behalf of our more than 100,000 member physical therapists, physical therapist assistants, and students of physical therapy, the American Physical Therapy Association (APTA) is pleased to submit comments in response to the US Department of Health and Human Services Office of the National Coordinator for Health Information Technology’s (ONC) Request for Information (RFI) on the draft Trusted Exchange Framework (Framework). The mission of APTA is to further the profession’s role in the prevention, diagnosis, and treatment of movement dysfunctions and the enhancement of the physical health and functional abilities of members of the public. Physical therapists are highly trained professionals who see patients in a variety of settings. These professionals perform evaluations including a patient’s history, a review of systems, and an administration of standardized tests and objective measures based on the patient’s presentation and the findings in the review of systems.

Through a collaborative process with the patient, and other members of the health care team when indicated, the physical therapist develops goals and a plan of care to address the needs of the patient. The physical therapist then executes that plan of care by providing specific techniques and procedures designed to optimize movement and function and decrease and/or manage pain. Physical therapy is also integral to reducing the risk for adverse events including further functional decline, falls, progression of pain or the long-term need for pain medication, avoidable surgical procedures and/or hospitalizations, and disability.
UCCDI Version 1 Data Classes
While we understand that the data classes in Version 1 are based on the 2015 Edition Common Clinical Data Set’s (CCDS) definitions, we are concerned that the needs of the providers not included within Meaningful Use have not been taken into consideration. For example, the problem list is based solely on SNOMED CT® International terms; however, there are additional terms that are critical in helping to describe the care that physical therapists and other non-physician practitioners deliver. These structured classifications are standardized and coded by the World Health Organization in “International Classification of Functioning, Disability and Health” (ICF). Examples include the neuro-musculoskeletal and movement-related functions of isolated muscles and control of complex voluntary movements. We encourage ONC to allow the inclusion of ICF-structured data as part of the standardized data that can be shared using Fast Healthcare Interoperability Resources (FHIR) and Consolidated-Clinical Document Architecture (C-CDA) standards as it relates to describing the problems that health care providers identify and address.

UCCDI Candidate Status Data Classes
We agree with the inclusion of “Functional Status” as a data class and feel that including the current standards of ICF terms and coded concepts in 2019 is appropriate. We encourage the description to include qualifiers related to the mobility aid that may be used and the amount of assistance needed to perform or participate in an activity.

UCCDI Emerging Status Data Classes
We agree with the addition of the data class “Care Provider Education/Licenses.” We encourage the description to also include the identification of students and residents. Finally, APTA agrees with the addition of the data class “Physical Activity” and notes that there is a coded concept in Logical Observation Identifiers Names and Codes (LOINC) related to this item (76460-5 Physical activity).

Conclusion
APTA thanks ONC for the opportunity to provide feedback on the draft Framework. Should you have any questions or need additional information, please contact Kara Gainer, director of regulatory affairs, at karagainer@apta.org or 703/706-8547. Thank you for your consideration.

Sincerely,

Sharon L. Dunn, PT, PhD
Board-Certified Orthopaedic Clinical Specialist
President

SLD: krg