



*National Committee on Vital and Health Statistics*

October 13, 2016

Vindell Washington, MD, MHCM  
National Coordinator for Health Information Technology  
U.S. Department of Health and Human Services  
330 C St SW, Floor 7  
Washington, DC 20024

**Re: ONC's Draft 2017 Interoperability Standards Advisory**

Dear Dr. Washington,

The National Committee on Vital and Health Statistics (NCVHS) is the statutory public advisory committee with responsibility for providing recommendations on health data and national health information policy and standards in a range of areas, including vital and health statistics, to the Secretary of the Department of Health and Human Services (DHHS). In this role, we are pleased to submit to you the following comments and recommendations regarding ONC's recently published "Draft 2017 Interoperability Standards Advisory."

We recommend that the 2017 Interoperability Standards Advisory include the following suite of standards for birth, death and fetal death reporting. Specifically, this suite supports the eVitals initiative of the National Center for Health Statistics. We suggest adding vital statistics in a new sub-section "Vital Statistics Reporting" within Section II-O "Public Health Reporting" under Section II – Content/Structure Standards and Implementation Specifications:

- HL7 Version 2.5.1 Implementation Guide: Birth and Fetal Death Reporting, Release 1.1 (US Realm)
- HL7 Version 3 CDA R2 Implementation Guide: Birth and Fetal Death Reporting, Release 1 (US Realm)
- Integrating the Healthcare Enterprise (IHE) Birth and Fetal Death Reporting – Enhanced (BFDR-E) supplement

- HL7 Version 2.6 Implementation Guide: Vital Records Death Reporting, R2 (US Realm)
- HL7 Version 3 CDA R2 IG: Reporting Death Info from the EHR to Vital Records, R1 (US Realm)
- Integrating the Healthcare Enterprise (IHE) Vital Records Death Reporting (VRDR) supplement

While the NCVHS recognizes that there are HL7 versioning issues in the current suite and that the suite currently lacks necessary transport specifications, it is our opinion that this suite is very promising and worthy of publicizing in the 2017 ISA so as to encourage further development and eventual adoption by state vital statistics authorities, EHR developers, hospitals and physicians.

We believe the timely, accurate, electronic reporting of births, fetal deaths and deaths using nationally recognized standards is key to achieving a more effective vital and health statistics system in the country. Having these data is essential to support evidence-based national health policy development and evaluation, influencing federal and state program and policy decisions, and measuring progress towards national and state health and health care goals. Including these standards in the ONC Standards Advisory will help position them to become nationally accepted standards for these data reports, even if not mandated for use by federal or state programs, laws or regulations.

Sincerely,

/s/

Walter G. Suarez, MD, MPH, Chair  
National Committee on Vital and Health Statistics

