

January 28, 2019

Don Rucker, M.D.
Office of the National Coordinator for Health Information Technology (ONC)
Department of Health & Human Services (HHS)
330 C St SW
Floor 7
Washington, DC 20201

RE: Strategy on Reducing Regulatory and Administrative Burden Relating to the Use of Health IT and EHRs

Dear Dr. Rucker,

On behalf of the 163,000 American Dental Association (ADA) dentist members, we write to thank you for the opportunity to comment on the Office of the National Coordinator for Health Information Technology (ONC) Strategy on Reducing Regulatory and Administrative Burden Relating to the Use of Health IT and EHRs.

We applaud and commend the ONC efforts in drafting the recommendations regarding the best next steps to address the growing problem of clinician burden related to their use of health IT and EHRs.

The “one size fits all” approach was mentioned several times throughout the document. The ADA agrees that when EHRs are developed and implemented for a variety of clinical specialties that have differing and often specialized workflows, that the specialties and their professional associations should have the opportunity at the product development stage to provide input on workflow needs, care coordination and interoperability.

In addition, the ADA believes that when workgroups are established by HHS, ONC, CMS and other federal offices to identify issues and strategies, the workgroups should include representation from the ADA on any matters related to dentistry. Without the ADA’s participation, products and standards would be modified to dentistry rather than developed specifically for the profession.

We have confidence in our members’ ability to deliver safe and effective quality dental care and rely on our strong commitment to the development and use of voluntary consensus standards for dentistry. The ADA is a national and international leader in the development of consensus standards and guidelines for materials, instruments, equipment, digital devices, and health information technology software impacting the safety and health of the public and the practice of dentistry. The ADA, as the only American National Standards Institute (ANSI) accredited Standards Development Organization (SDO) for dentistry, should be recognized by ONC as the authoritative voice for the dental profession to provide pertinent dental information related to administrative burden relating to the use of health IT and EHRs.

The ADA is actively engaged in the development and maintenance of vocabularies critical both for clinical health information exchange and for the population of data in the electronic health record. For example, the ADA's Code on Dental Procedures and Nomenclature (CDT), is a vocabulary that is a named HIPAA standard for use in electronic administrative transactions for dental claims. The ADA's leadership role with regard to standards was also recognized by the HIPAA legislation naming the ADA as an entity to be consulted when the HHS Secretary is considering adoption of a new or modified HIPAA administrative simplification standard. The ADA is the only professional association so named. The ADA also developed a subset of the Systematized Nomenclature of Medicine Clinical Terms (SNOMED CT) called the Systematized Nomenclature of Dentistry (SNODENT), which is now an ANSI approved American National Standard (ANSI/ADA Standard No.2000.2 for a Systematized Nomenclature of Dentistry). As with informatics standards, the ADA is also renowned as a leader in dental product certification.

As the authoritative voice for dentistry, we are committed to improving the nation's oral health through public education and through legislative advocacy. We appreciate the opportunity to comment on the Strategy on Reducing Regulatory and Administrative Burden Relating to the Use of Health IT and EHRs.

Again, thank you for providing us the opportunity to comment. If there are questions concerning these comments, please contact Ms. Jean Narcisi, Director of Dental Informatics for the American Dental Association at 312-440-2750 or by e-mail at narcisij@ada.org.

Sincerely,

/s/

Jeffrey M. Cole, D.D.S., M.B.A.
President

JMC:KTO:jn

/s/

Kathleen T. O'Loughlin, D.M.D., M.P.H.
Executive Director