



June 30, 2023

The Honorable Micky Tripathi
National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
330 C Street, SW, 7th Floor
Washington, DC 20201

Dear Mr. Tripathi,

On behalf of Provation, I am writing in response to the Office of the National Coordinator for Health Information Technology's (ONC) recent solicitation for comments on the proposed USCDI+ Data Element List for Quality Measurement (USCDI+QM). Thanks for the opportunity to comment.

By way of background, Provation is a leading provider of healthcare software and SaaS solutions for clinical productivity, care coordination, and quality reporting. Our purpose is to empower providers to deliver quality healthcare for all. Provation's comprehensive portfolio spans the entire patient encounter, from pre-procedure through post-procedure, with solutions for physician and nurse documentation, anesthesia documentation, patient engagement, surgical care coordination, quality reporting, order set and care plan management and EHR embedded clinical documentation. Provation serves more than 5,000 hospitals, surgery centers and medical offices and 700 physician groups globally, including 19 of the top 20 U.S. hospitals. In 2021, Provation was acquired by Fortive Corporation, a Fortune 1000 company that builds essential technology and accelerates transformation in high-impact fields like workplace safety, engineering and healthcare.

We commend ONC for its development of the USCDI as the foundation of data elements and classes that all electronic health record technology should be able to collect, analyze and share between providers. Our comments focus on the **Procedures** data class for the USCDI+QM.

Earlier this year, we recommended in comments to ONC that the *Location of Procedure* data element be added to USCDI v.4. We are pleased to see its proposed inclusion in USCDI+QM and strongly support this. Also, given the importance of granular procedure documentation in quality reporting, we support the proposed *Clinical Status*, *Status* and *Order Time* data elements in the **Procedures** Data Class. Though it is not proposed, we recommend adding a *Procedure Duration* data element, which not only has utility for quality reporting but for measuring efficiency as well.

Thank you again for allowing us to comment. If you or your staff have questions or would like to discuss our comments in more detail, please contact me at ankush.kaul@provationmedical.com or 612-313-1550.

Sincerely,

A handwritten signature in black ink that reads "Kaul". The signature is written in a cursive style with a large, looped initial "K" and a horizontal line underneath the name.

Ankush Kaul
President
Provation