

April 6, 2021

Donna Pickett, MPH, RHIA
ICD-10 Coordination and Maintenance Committee
National Center for Health Statistics
3311 Toledo Road
Hyattsville, MD 20782

Dear Ms. Pickett:

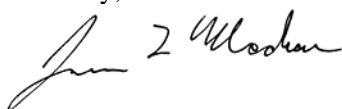
On behalf of the physician and medical student members of the American Medical Association (AMA), I am writing to request that the National Center for Health Statistics (NCHS) adopt the Gravity Project Multi-Domain Social Determinants of Health ICD-10-CM submission as presented to the ICD-10 Committee during its March 10, 2021 meeting for October 2021 release.

Systemic racism, routine exposures to discrimination, and long-standing economic inequality have produced an environment in which historically marginalized and minoritized communities are profoundly underserved. The COVID-19 pandemic has illustrated how these structural determinants of health equity intersect with social determinants of health (SDOH)—defined as the underlying community-wide social, economic, and physical conditions in which people are born, grow, live, work, and age—to significantly impact a community’s health care access, quality, outcomes, and affordability. The collection of SDOH concepts at the point of care can provide physicians a more complete picture of an individual’s health, identify patient and family social needs, and assist with both medical and non-medical interventions needed to improve one’s health. For example, organizations are increasingly using SDOH data to identify communities at greater risk of contracting COVID-19. Yet, more must be done to improve the capture and exchange of SDOH information; existing terminology is insufficient to meet these goals. The new codes will help to address current gaps in capturing and describing the SDOH impacting patient care.

Additionally, successful use of these codes requires recognition of the inherent sensitivity of SDOH data. The health care community must ensure that patients are comfortable sharing such data with their physicians. Thus, we encourage NCHS to coordinate with the Office of the National Coordinator for Health Information Technology, the Department of Health and Human Services Office for Civil Rights, and standards development organizations to ensure data are shared securely and with appropriate protections for use and re-disclosure.

Thank you for reviewing our request. Should you have any questions, please contact Matt Reid, Senior Health IT Consultant, Federal Affairs, at matt.reid@ama-assn.org.

Sincerely,



James L. Madara, MD