

June 16, 2025

The Honorable Dr. Mehmet Oz
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
7500 Security Blvd.
Baltimore, MD 21244

Submitted via the Federal Regulations Web Portal, <http://www.regulations.gov>

RE: Request for Information; Health Technology Ecosystem

We commend the Centers for Medicare & Medicaid Services (CMS) and the Assistant Secretary for Technology Policy/Office of the National Coordinator for Health Information Technology (ASTP/ONC) for addressing the state of data interoperability and broader health technology infrastructure. The release of this Request for Information (RFI) underscores CMS's commitment to fostering collaboration with stakeholders to enhance healthcare delivery and outcomes.

Persistent disparities in health outcomes, particularly among historically underserved communities, are exacerbated by outdated and incomplete data collection practices¹. The adoption of comprehensive and standardized data collection categories is crucial for enhancing data access, utilization, and community-driven interventions.

To improve interoperability and support equitable health outcomes, we urge the Department of Health and Human Services (HHS) and its agencies, including CMS, to adopt and promote the 2024 revised Office of Management and Budget (OMB) Statistical Policy Directive No. 15 (SPD 15) standards for the collection and use of race and ethnicity data. Standardizing these elements across federal programs, health IT systems, and value-based care models is foundational to identifying disparities, mitigating bias in emerging technologies, and advancing health equity². This aligns with the RFI's emphasis on strengthening interoperability and ensuring secure, standards-based data exchange.

Incorporating the updated OMB SPD 15 categories into the United States Core Data for Interoperability (USCDI), FHIR implementation guides, and health IT certification criteria will promote consistency across the ecosystem and support CMS's broader goals in prevention, wellness, and chronic disease management³. Further, these standards will aid in bias mitigation in AI tools used for clinical decision support and resource allocation.

We respectfully urge CMS and ASTP/ONC to integrate the revised OMB SPD 15 standards into all plans to advance interoperability.

As conveners of the Data Equity Coalition, we appreciate the opportunity to provide comments on this Request for Information (RFI).

Sincerely,

Data Equity Coalition Stakeholders

¹ [The Issues of Interoperability and Data Connectedness for Public Health - PMC](#)

² [Data Standards - Tools and Technologies for Registry Interoperability, Registries for Evaluating Patient Outcomes: A User's Guide, 3rd Edition, Addendum 2 - NCBI Bookshelf](#)

³ [Dr. Mehmet Oz Shares Vision for CMS | CMS](#)