

Submitted to National Quality Forum in response to request for comments about Forum's "Priority Setting for Health Care Performance: Getting to Measures that Matter for Adult Immunizations."

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The American Immunization Registry Association AIRA is a membership organization that promotes the development and implementation of immunization information systems (IIS) as an important tool in preventing and controlling vaccine preventable diseases. The organization provides a forum through which IIS programs, and interested organizations, individuals and communities combine efforts, share knowledge, and promote activities to advance IIS and immunization programs. AIRA appreciates the opportunity to comment on the National Quality Forum's "Priority Setting for Health Care Performance: Getting to Measures that Matter for Adult Immunizations."

Overall, AIRA is very supportive of NQF's statements about the role that IIS can play in improving and measuring adult immunization coverage. We appreciate your recognition that expanding use of IIS for adult immunizations will require more funding. We cannot emphasize this need enough. IIS are already doing more than originally anticipated and often with less funding. And although many IIS currently accept adult immunization data, many are running into capacity issues. To perform well as lifespan registries, IIS need more resources to handle the influx in data, increased number of participating providers (including complementary), increasing number of interfaces with EHR systems, infrastructure enhancements, and adult-specific software development.

Your report contains recommendations and strategies to strengthen and encourage use of IIS for adult measurement (p 11). AIRA's comments follow:

- 1st bullet: *"Encouraging and incentivizing providers to submit immunization data to IIS (via EHR or other)"* **Yes, we agree – with additional funding for IIS, and as long as adult providers are not prioritized over pediatric providers when incentives are given.**
- 2nd bullet: *"Encouraging further adoption of voluntary national data standards for IIS, which could eventually be written into legislation."* **We suggest omitting "which could eventually be written into legislation." AIRA is currently exploring the benefits of IIS certification, and supports continued development of national standards for IIS.**
- 3rd bullet: *"Further developing IIS for all states, territories and DC to adopt CDC functional standards that include bidirectional interoperability with providers and other IIS; core data elements that include patient refusal and contraindications; and allowing patient access to IIS data."* **We support CDC functional standards (which currently include interoperability) and CDC core data elements (which currently include patient refusal and contraindications). The CDC functional standard about patient access reads: "With appropriate levels of authentication, IIS can provide copies of immunization records to individuals or parents/guardians with custodial rights." Many IIS currently provide records to consumers through a paper-based system using a Consent for Release of Medical Information. Direct, online access to IIS data by consumers is still much debated because of authentication concerns. Though it is a worthy goal, other methods of providing records to consumers may prove more feasible and preferable, such as through online access to their own provider's medical record once bidirectional data exchange is achieved.**

- 4th bullet: *“Encouraging a focus on eMeasure development.”* **AIRA supports the development of measures that use EHR, IIS, and other sources of electronic data.**