



American Immunization Registry Association (AIRA) Response to the ONC IFR

RE: File Code RIN 0991–AB58: Health Information Technology: Initial Set of Standards, Implementation Specifications, and Certification Criteria for Electronic Health Record Technology

The American Immunization Registry Association AIRA is a membership organization with the mission to promote the development and implementation of immunization information systems (IIS) as an important tool in preventing and controlling vaccine preventable diseases. (In the ONC IFR, IIS are referred to as “immunization registries.”) 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.

The AIRA members, as representatives of the IIS community, recently took the opportunity to review and provide comments on the Interim Final Rule issued on December 30, 2009 by the Office of the National Coordinator for Health Information Technology (ONC). This Rule, also called the ONC IFR, “represents the first step in an incremental approach to adopting standards, implementation specifications, and certification criteria to enhance the interoperability, functionality, utility, and security of health IT and to support its meaningful use. The certification criteria adopted in this initial set establish the capabilities and related standards that certified electronic health record (EHR) technology will need to include in order to, at a minimum, support the achievement of the proposed meaningful use Stage 1 (beginning in 2011) by eligible professionals and eligible hospitals under the Medicare and Medicaid EHR incentive programs.”¹

AIRA would like to make a specific recommendation that pertains to the following section:

Subpart C—Certification Criteria for Health Information Technology (page 2045)

...

(m) Submission to immunization registries. (page 2046)

Electronically record, retrieve, and transmit immunization information to immunization registries in accordance with:

- (1) One of the standards specified in Sec. 170.205(h)(1) and, at a minimum, the version of the standard specified in Sec. c; or
- (2) The applicable state-designated standard format.

¹ <http://healthit.hhs.gov/portal/server.pt?open=512&objID=1153&mode=2>

We recommend removing the “; or” in sentence (1) above, and entirely removing sentence (2) above, which reads “The applicable state-designated standard format.” This statement is inconsistent with Subpart B (shown below), which clearly defines the content exchange standards as HL7 version 2.3.1 or version HL7 2.5.1. We believe that allowing states to adopt their own format is confusing and not in keeping with the concept of a uniform standard. In addition, many IIS already have HL7 capability, over 54 percent of IIS have the capability to send and/or receive immunization data using HL7 version 2.3.1 or HL7 2.5.1.²

Subpart B—Standards and Implementation Specifications for Health Information Technology (page 2043)

§ 170.205 Content exchange and vocabulary standards for exchanging electronic health information.(page 2043)

...

(h) Electronic submission to immunization registries. (page 2044)

(1) The Secretary adopts the following content exchange standards for electronic submission to immunization registries:

(i) Standard. HL7 2.3.1 (incorporated by reference in § 170.299).

(ii) Alternative standard. HL7 2.5.1 (incorporated by reference in § 170.299).

(2) The Secretary adopts the following vocabulary standard for electronic submissions to immunization registries.

(i) Standard. HL7 Standard Code Set CVX—Vaccines Administered, July 30, 2009 version (incorporated by reference in § 170.299).

(ii) [Reserved]”

The AIRA members had one general comment about the ONC IFR as it relates to IIS. The members encourage the ONC to leverage the substantial past work already done in this area by initiatives such as the Healthcare Information Technology Standards Panel (HITSP) Interoperability Specifications, including the Interoperability Specification (IS) for Immunization and Response Management, IS10.

AIRA also contributed to the development of responses to the CMS NPRM and the ONC IFR by the Public Health Data Standards Consortium (PHDSC) and the Joint Public Health Informatics Taskforce (JPHIT). As such, AIRA also supports the PHDSC and JPHIT responses to the CMS NPRM and the ONC IFR.

² 2008 Centers for Disease Control and Prevention (CDC) IIS Annual Report.
http://www2a.cdc.gov/nip/registry/IISAR/IISAR_QUERY.asp