



**AIRA**  
AMERICAN IMMUNIZATION  
REGISTRY ASSOCIATION

# INFORMATION REQUEST

Topic: IIS Query Management and Payer Access Policies

**Request Date:** November 12, 2025

**Information Requested:**

The New York City Department of Health and Mental Hygiene is seeking to learn about some of the mechanisms jurisdictions use to share vaccination data with payers (e.g., health plans, managed care organizations). Specifically:

- Do you place limits on processing queries (QBPs) from these organizations? For example:
  - Do you limit the number of queries these organizations can send or that your IIS processes in a given time period?
  - Do you restrict the time of day when queries can be sent or will be processed?
- Do you charge these organizations for access to IIS data, and if so, how does this work?
  - Are these charges per query? On a sliding scale? And how much?
  - What are some of the challenges encountered while implementing the fee policy?

**Requesting Member:** Alexandra Ternier

**Responding Member(s):** Austin Fuoco (PA)

**Results:**

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**Colorado:**

***Do you place limits on processing queries (QBPs) from these organizations?***



We currently do not process QBPs for payers. We do allow them to upload a flat file to the IIS that is then processed automatically during non-business hours (evenings and weekends). The payer then receives the matched information. This does require us to register the payer as an organization in the IIS as well as give a user or two from the payer limited access only to upload and download the files.

***Do you limit the number of queries these organizations can send/your IIS processes in a given time period?***

The limit is 250,000 patients per file. We tell users it is 25,000 to lighten the load, though some ignore this. In our experience, it is rare to see files over 200,000, but we are a smaller jurisdiction. They can submit files once per month.

We have not had any failures with the flat file processes or other IIS processes due to the file's being too large. We have had failures due to payers' submitting the files incorrectly or with some special characters that cannot be parsed.

***Do you restrict the time of day when queries can be sent/will be processed?***

When the payer uploads the file, it will not be processed until non-business hours. The payer can then receive the file the next business day.

***Do you charge these organizations for access to IIS data, and if so, how does this work? Are these charges per query? On a sliding scale? And how much?***

We do not charge for this service.

***What are some of the challenges encountered while implementing the fee policy?***

We are in the very early stages of looking at charging payers for this data. The biggest challenge is legal/policy. As a municipal jurisdiction, there may be state laws that need to be considered. There will most likely have to be a regulation or law codified at your jurisdiction allowing for a fee structure.

If a fee policy is implemented, another challenge is how the fee is charged, the amount, and how it is collected. Another challenge is who gets the revenue from such a process; it may not stay entirely in the IIS.