



AIRA
AMERICAN IMMUNIZATION
REGISTRY ASSOCIATION

INFORMATION REQUEST

Topic: HL7 Connections with Schools

Request Date: February 18, 2026

Information Requested:

The Philadelphia Department of Public Health is seeking information on jurisdictions' experiences with establishing and using HL7 connections with schools.

Specifically:

- Has your jurisdiction established an HL7 connection with a school district or attempted to set up such an HL7 connection?
 - When your jurisdiction was about to establish a school HL7 connection, what barriers did you run into? Has this been a beneficial connection? Does your organization support school-based submission to the IIS and/or IIS query and response messaging with schools? Did you require additional legal agreements for this connection beyond what other vaccine reporting providers complete? If data are submitted to your IIS, how are FERPA (Family Educational Rights and Privacy Act) regulations such as consent to share addressed? Are the data submitted by the school available/accessible to other users of your IIS?
 - If your jurisdiction attempted to establish a school HL7 connection but could not complete the project, what ultimately led to the inability to establish the connection? What is needed to revisit this conversation?
- If your jurisdiction has not attempted this, do you have any additional notes or thoughts on why this has not been or should not be attempted?

Requesting Member: Megan Marren

Responding Member(s): Brian Napier (OH), Kim Gulliver (CO)

Results:

Note: AIRA recognizes that our members and partners often create solutions or provide services that our members and partners may be interested in. We invite entities to join AIRA with the understanding that AIRA must maintain a neutral stance with regards to



AIRA
AMERICAN IMMUNIZATION
REGISTRY ASSOCIATION

INFORMATION REQUEST

promoting specific products and services. AIRA does not endorse or imply any endorsement of any member or partner or their products and/or services.

Ohio:

In Ohio, school nurses with active licenses are allowed access to the registry as a convenience to schools, vaccination providers, and parents looking to document compliance with school vaccine requirements. Although in a few cases it's technically possible, we don't encourage school nurses to enter data into the IIS, only to read what is there to supplement their records.

About six years ago, we started to get approached by school EHR vendors about HL7 connections. We decided not to establish relationships with any of these companies.

However, if a nurse from a school district that is actively enrolled with the IIS requests credentials for an HL7 connection, we make those available to that nurse. The way the connection is set up on our side, school districts can only get responses to HL7 query messages. We do not import data from school electronic systems. This limits our need to work with some of the challenges you asked about.

I think that the results have been largely positive. I believe the records in the school systems are probably more accurate than they would be if we had thousands of people copying information from one system and manually transferring it to another. There's not a good mechanism to correct school systems if, for example, we learn that the IIS profiles for one child included some of a sibling's vaccination history, though.

The primary challenge that we have seen is with volume. When schools were reopened after COVID lockdowns, the vaccination history was important for nurses tracking exposures, and we had some large school districts querying the entire student population several times per week to get the latest history.

Over this last season we had many more school districts with active connections, and we noted that some sent many times more queries than students enrolled in their districts in September and October.

We are thinking through how to manage this. We could give guidance before the year begins to limit the queries to students who are in certain categories or to students who are noted to have incomplete records.



If we continue to see unusual volumes, we aren't sure what our next step would be. Do we suspend a connection that seems to be overusing the privilege and, if so, for how long? Would it actually help our system to not respond to queries, or does a failed connection message also affect system performance? Would the queries just all get queued and sent again once the connection is reactivated?

Because we don't have direct relationships with the school EHR vendors, we will need to do some work to talk through with them our concerns and suggestions for throttling volume on the sender side. And because we don't have those relationships, I can't tell you anything about particular companies, though it's my sense that several have had an easy time establishing these query interfaces, and we have had a few districts slip in some VXU messages when we didn't set the interfaces up correctly, so I know that's a possibility.

Colorado:

Colorado has established query-only HL7 connections with 22 different school, child care, and Head Start organizations. We do not allow VXU submissions but have supported these query-only interfaces for a number of years. These organizations contract directly with one of the third-party vendors listed below to establish this connection:

- STC
- MyHeadStart
- SchoolCare
- HCA
- Frontline

Here are answers to your remaining questions:

When your jurisdiction was about to establish a school HL7 connection, what barriers did you run into?

These connections have been quite easy to establish. Initially, we had to have discussions about how they would trigger messages, the volume of messages expected, and how they would adhere to FERPA. Sometimes the most difficult part of these is obtaining all of the required paperwork before the connection can be established.



AIRA
AMERICAN IMMUNIZATION
REGISTRY ASSOCIATION

INFORMATION REQUEST

Has this been a beneficial connection?

The biggest benefit is for the querying organization because they can more easily obtain vaccination information on their entire student population instead of manually searching for each record in our IIS. There is some value to our IIS because this does make it easier for them to obtain records for school compliance and likely assists with annual school reporting.

Does your organization support school-based submission to the IIS and/or IIS query and response messaging with schools?

We do not support submission messages, because there has been a concern about data quality and potential duplication. We have supported query-only interfaces.

Did you require additional legal agreements for this connection beyond what other vaccine reporting providers complete?

Yes, we do require additional agreements. First, the school, child care, or Head Start have to complete our typical enrollment paperwork (CIIS Letter of Agreement and CIIS Administrator Form). In addition, we require a CIIS Delegatory Agreement to be on file. The Delegatory Agreement is signed by the query organization, the vendor, and our IIS manager. By signing this agreement, the query organization is giving the vendor access to see IIS data on its student population. I have attached a blank Word and fillable PDF template from one of our vendors so you can see what is included in this agreement.

If data are submitted to your IIS, how are FERPA (Family Educational Rights and Privacy Act) regulations such as consent to share addressed?

During the initial meeting with each vendor, we discussed FERPA requirements and how they would adhere to them. When I was working on these connections, the vendors had a process in place to track FERPA consent within their system, and if FERPA consent was not obtained, then they were not supposed to send that student to our IIS. We clearly state on our [FERPA and CIIS website](#) that we are not responsible for ensuring that schools comply and they are responsible for ensuring FERPA regulations are followed.

Are the data submitted by the school available/accessible to other users of your IIS?



AIRA
AMERICAN IMMUNIZATION
REGISTRY ASSOCIATION

INFORMATION REQUEST

Since we do not support VXU submissions, no data are available to other users. The querying entity sees only the responses received for the student population it sends us.