

Public Health Data Systems Hearing, AIRA Comments

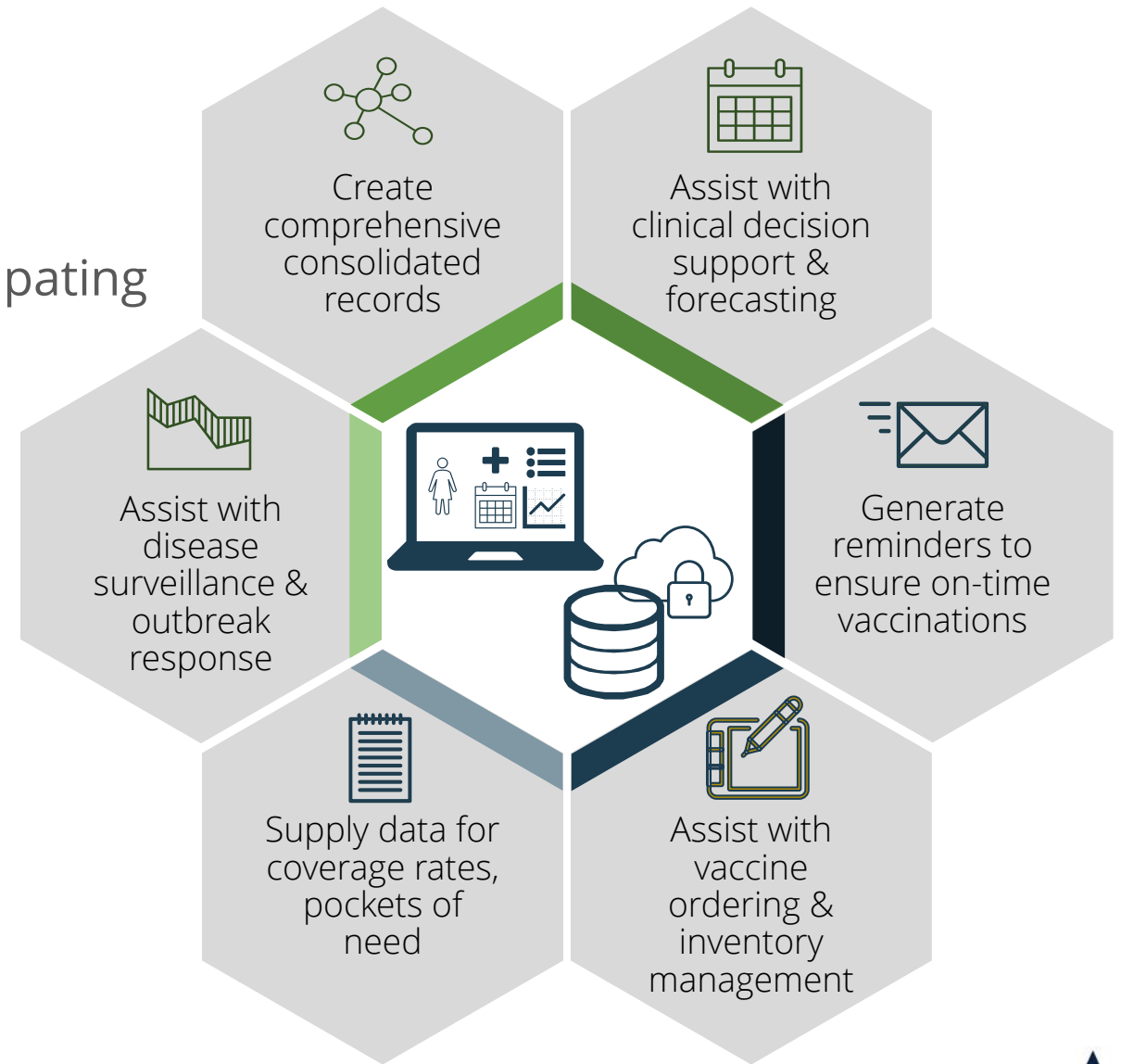
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IIS Background

IIS are confidential, population-based, computerized databases that record all immunization doses administered by participating providers to persons residing within a given geopolitical area

- **63 IIS** across the US
- Use well-adopted standard of **HL7 V2** messaging
- Governed by **local law and policy**
- Pre-covid (in 2019), there were nearly **117,000 active interfaces**, most supporting both submission and query (now up ~25%)
 - Average submissions per IIS: **17,000/day**
 - Average queries per IIS: **32,000/day**



Strengths of the COVID-19 Response

IIS were able to consistently:

- leverage existing interfaces with private and public provider sites on day 1 when vaccine arrived
- onboard abundant new immunizing sites, particularly non-traditional partners
- submit nation-wide record-level (redacted) data to CDC daily
- test the concept of a broad, nation-wide reporting mandate

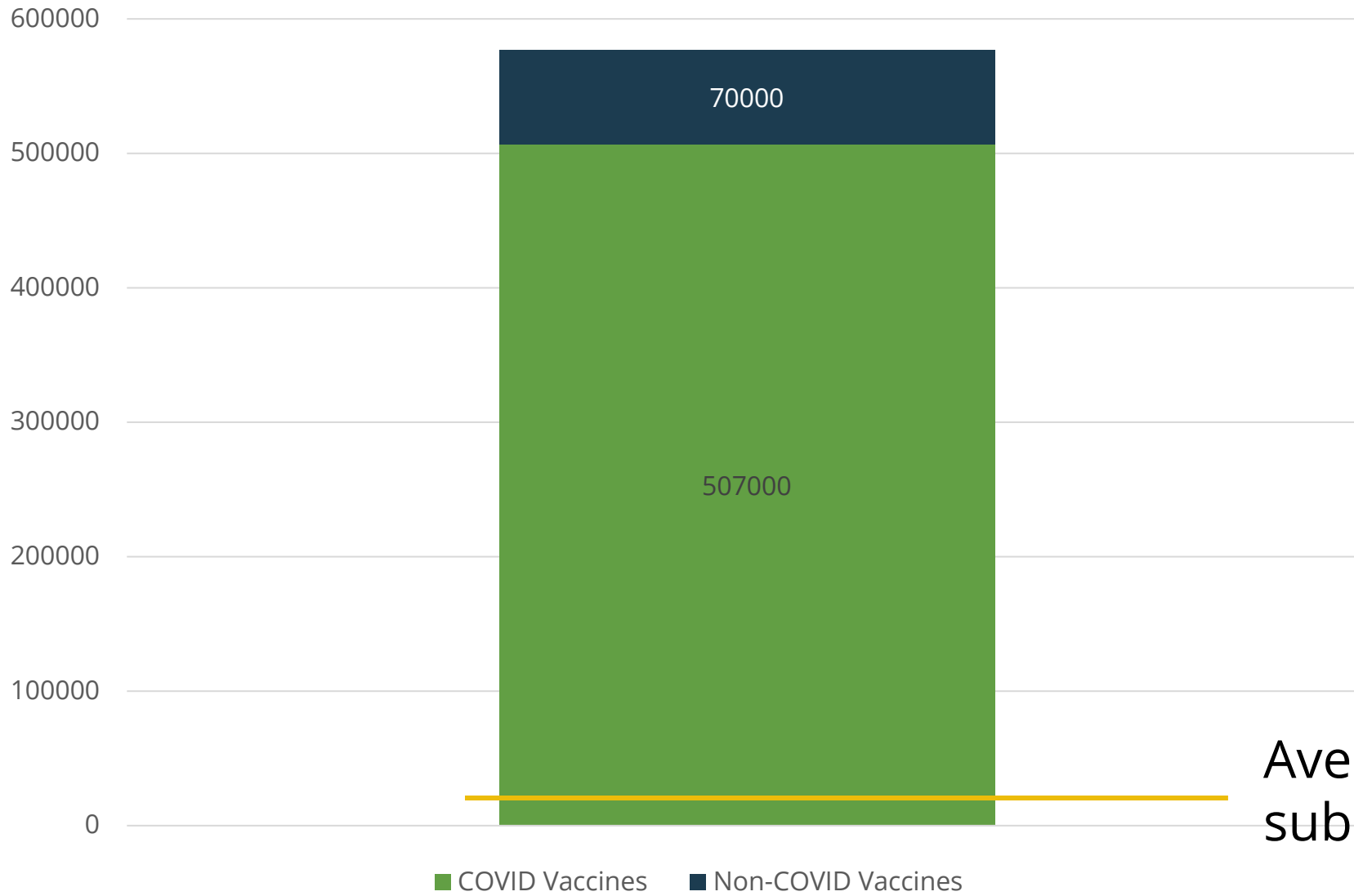


Gaps and Challenges

Despite broad gains in standardization:

- some variation persists that slows interoperability
 - Modifiable (e.g., standards constraints) vs. necessary variation (e.g., consent laws)
 - Onboarding processes
- data to support health equity challenges is not yet complete and available (e.g., race, ethnicity)
 - IIS can influence this, but shared responsibility
- IIS processing capacity needs to continue to expand





Snapshot of Growth in Volume of Daily Submissions:

One IIS Experience

Average pre-COVID daily submissions = **17,000**



Looking Forward

Immediate Needs

- **Guidance** on topics like vaccine credentials to support standardization
- Support and expand **third party testing** to minimize IIS variation
- **Expand incentive programs** to promote best practices (e.g., reviewing, acting on acknowledgements, consuming immunizations)

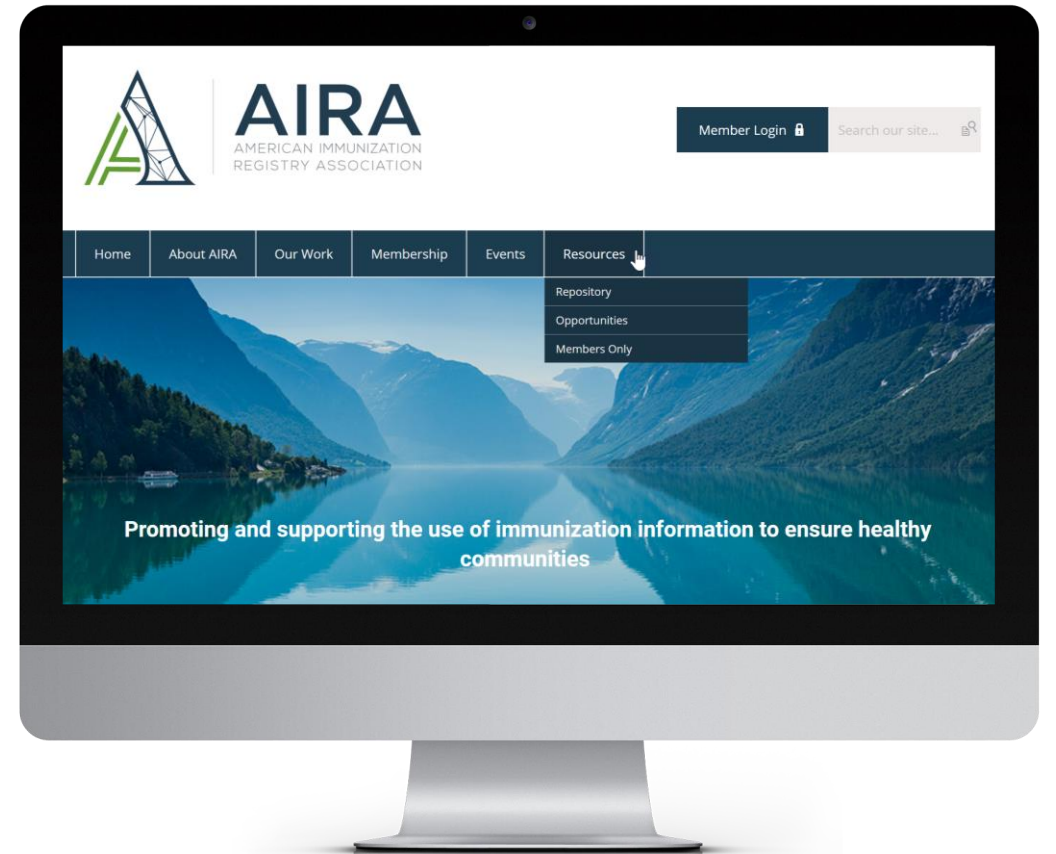
Longer Term Needs

- **National policy framework** to increase standardization
- Consider where **FHIR** could support new messaging, and plan strategic transition
- Sustainable, dedicated **funding** to support long-term planning to **modernize** and **maintain** national network of IIS



Thank You

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