Public Health Data Systems Hearing, AIARA 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

AIRA Survey March 2020, AIRA member conversations, April 2021
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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