



**AIRA**  
AMERICAN IMMUNIZATION  
REGISTRY ASSOCIATION

September 20, 2019

Office of the National Coordinator for Health Information Technology  
U.S. Department of Health and Human Services  
200 Independence Avenue SW, Suite 729-D  
Washington, DC 20201

Submitted Electronically

RE: Public Comment on ONC 2019 Interoperability Standards Advisory

Dear Office of the National Coordinator for Health IT:

On behalf of the American Immunization Registry Association (AIRA) we are pleased to submit updated comments on ONC's **2019 Interoperability Standards Advisory**. These comments are a compilation of the collective input of our members. As a member organization with more than 600 members representing 77 Public Health organizations, 12 businesses and sponsors, and 512 individuals from Immunization Information System (IIS) programs and partners, these comments represent a broad perspective on federal actions that affect immunization programs across the country, particularly as they relate to issues that impact the interoperability of immunization records.

AIRA's comments are presented on the following pages, called out by section within the Standards Advisory. Please contact Mary Beth Kurilo, AIRA's Policy and Planning Director, with any questions: [mbkurilo@immregistries.org](mailto:mbkurilo@immregistries.org). Our comments this round are more abridged than previous years, given that we've commented on many of these standards in the past.

AIRA greatly appreciates the efforts of ONC to coordinate the adoption of standards specifications across agencies, and we look forward to supporting our members and partners in adopting selected standards.

Sincerely,

Rebecca Coyle MEd, Executive Director  
American Immunization Registry Association (AIRA)



1155 F Street NW, Suite 1050 Washington, DC 20004



202.552.0208



[immregistries.org](http://immregistries.org)



## Comments on the ONC 2019 Interoperability Standards Advisory

Section and/or Section Number	Excerpt	Comment
Scope	Starting with the 2017 ISA, the ISA's focus expanded to more explicitly include public health and health research interoperability.	AIRA applauds the continued explicit focus on public health as an important part of Health IT.
Representing Immunizations – Administered	Standard: RxNorm	Adoption of RxNorm continues to be listed at “Feedback Requested”. The AIRA/IIS community has not adopted RxNorm and it is not planned for adoption either in the near or long term given the movement to NDC found in regulations.
Representing Immunizations – Administered	Applicable Value Set(s) and Starter Set(s): <a href="#">CVX: Vaccines Administered 2.16.840.1.113762.1.4.1010.6</a> <a href="#">MVX: entire code set</a>	National Drug Codes are listed in the table above, but AIRA would recommend that they be listed under Applicable Value Set(s) and Starter Set(s) down below as well.
Representing Immunizations – Historical	Standard/Implementation Specification: CVX, MVX	AIRA supports the focus on CVX and MVX as the primary code sets. We also support RxNorm being deemphasized. The AIRA/IIS community has not adopted RxNorm and it is not planned for adoption either in the near or long term.
Exchanging Immunization Data with Immunization Registries	HL7 2.5.1 Release 1.5	AIRA strongly believes the adoption level for HL7 2.5.1 Release 1.5 is higher than 3/5. Consider 4/5, representing medium-high adoption. AIRA anticipates that, with slightly more adoption of query, the IIS/EHR community will soon reach 5/5.



Section and/or Section Number	Excerpt	Comment
Transport for Immunization Submission and Query/Response	CDC-EHR-IIS Interoperability Enhancement Project Transport Layer Protocol Recommendation Formal Specification, Web Site Disclaimers Version 1.2	At this point, from testing across the community, AIRA believes the adoption level is now arguably 5/5 for transport adoption.
Appendix IV – State and Local Public Health Readiness for Interoperability	State and Local Public Health Agencies (PHAs) support interoperability efforts and data exchange with electronic health records, many of which have been utilized by the <a href="#">Centers for Medicare &amp; Medicaid Services (CMS) Promoting Interoperability Programs</a> . This appendix points to PHA websites at the jurisdictional level where interested parties can obtain information such as the local implementation guides, which programs and implementation guides are supported, contact information etc.	AIRA supports the helpful inclusion of links to state and local public health programs. Linkages like this can assist interoperability partners with connecting earlier within and across industries, and AIRA appreciates ONC's efforts to facilitate this process.

