AVAC
ADULT VACCINE
ACCESS COALITION

May 29, 2015

Dr. Karen DeSalvo
Office of the National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
200 Independence Avenue, SW
Washington, DC 20201

**RE: RIN 0991-AB93 2015 Edition Health Information Technology (Health IT)
Certification Criteria, 2015 Edition Base Electronic Health Record (EHR) Definition,
and ONC Health IT Certification Program Modifications**

Dear Dr. DeSalvo,

As participants in the Adult Vaccine Access Coalition (AVAC), we appreciate the opportunity
to comment on 2015 Edition Health Information Technology (Health IT) Certification Criteria,
2015 Edition Base Electronic Health Record (EHR) Definition, and ONC Health IT
Certification Program Modifications.

AVAC consists of organizational leaders in health and public health that are committed to
tackling the range of barriers to adult immunization, to raise awareness of and to engage in
advocacy on the importance of adult immunization. Our mission is informed by a growing
body of scientific and empirical evidence of the benefits of immunization by improving health,
and protecting lives against a variety of debilitating and potentially deadly conditions, as well
as by saving costs to the healthcare system and to society as a whole.

AVAC priorities and objectives are driven by a consensus process with the goal of improving
access and utilization of adult immunizations. A top priority for AVAC is encouraging greater
utilization of health information technology to support clinical decision making and to improve
reporting of adult immunization data to state immunization information systems (IIS). We
appreciate this opportunity to offer comment on the proposed rule.

We commend ONC on your work to lay out coding criteria for the reporting of immunizations,
current as well as historical, and to provide updated standards to ensure timely and accurate
reporting of detailed information around immunization events.

In moving forward, we encourage you to work closely with federal, state and local public and
private sector organizations who share ONC's goal of building standardized coding systems
and certification criteria that will enhance the value of IIS to providers and the public health
community while minimizing the additional burden of compliance with these standards.

Additionally, we applaud ONC for including bidirectional information exchange between
provider EHR systems and IIS'. The ability to report immunization events as well as receive
information regarding the immunization status of a patient and providing cues as to
appropriate immunizations for that individual based on their age and health status is a

remarkable step forward in improving the quality of patient care and as well as avoiding preventable illness.

Your effort to include more detailed information around race, ethnicity, and primary/preferred language in immunization data reporting is an important step to addressing health disparities and authentic consent. This information would be valuable in the identification of health disparities in minority communities and help inform efforts to address gaps in access to immunization services.

Overall, we believe that ONCs work to align health information technology standards through the certification process will go a long way towards ensuring that a strong and sustainable interoperability network around immunization data reporting can be achieved. AVAC stands ready to work with you to reach this goal.

Thank you for this opportunity to offer our perspective. Please contact the AVAC Coalition Manager at (202) 540-1070 or lfoster@nvgllc.com if you wish to further discuss our comments or learn more about the work of AVAC.

Sincerely,

Asian & Pacific Islander American Health Forum
Biotechnology Industry Organization
GSK
Infectious Diseases Society of America
National Association of County and City Health Officials
National Minority Quality Forum
Novavax
Scientific Technologies Corporation