



June 15, 2015

Centers for Medicare and Medicaid Services
U.S. Department of Health and Human Services Attn: CMS-3311-P
P.O. Box 8013
Baltimore, MD 21244-8013

RE: CMS-3311-P Medicare and Medicaid Programs; Electronic Health Record Incentive Program – Modifications to Meaningful Use in 2015 Through 2017

To Whom It May Concern:

As participants in the Adult Vaccine Access Coalition (AVAC), we appreciate the opportunity to comment on CMS-3311-P Medicare and Medicaid Programs; Electronic Health Record Incentive Program – Modifications to Meaningful Use in 2015 Through 2017.

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 in 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 applaud CMS 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.

We encourage you to work closely with federal, state and local public and private sector organizations to ensure that the timetable put forth in this proposed rule compliments efforts through Stage 3 Meaningful Use as well as ONC's HIT Certification program criteria and modifications. Bidirectional data exchange and query capability for Medicare and Medicaid providers through EHR systems is extremely important to overall efforts to improve immunization rates for the elderly and at risk populations. This work should closely align with complimentary efforts within the broader health care system in order to minimize the burden of compliance with these standards for providers and state immunization information systems alike.

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,

American Association of Occupational Health Nurses
Biotechnology Industry Organization
Immunization Action Coalition
Infectious Diseases Society of America
National Association of County and City Health Officials
National Foundation for Infectious Diseases
National Minority Quality Forum
National Viral Hepatitis Roundtable
Pfizer
Sanofi Pasteur
Takeda Vaccines
Trust for America's Health