



May 7, 2012

Department of Health and Human Services
Office of the National Coordinator for Health Information Technology
Attention: 2014 Edition EHR Standards and Certification Criteria Proposed Rule
Hubert H. Humphrey Building, Suite 729D
200 Independence Avenue SW
Washington, D.C. 20201

Re: RIN 0991-AB82

Dear Office of National Coordinator for Health IT:

The Association of Immunization Managers (AIM) is a membership organization representing the 64 federally-funded state, local and territorial immunization programs. AIM members are the managers of these programs receiving Section 317 immunization grants to ensure high immunization coverage rates in the population. AIM strongly supports the development of the Immunization Information Systems (IIS) and their linkage with Electronic Health Records (EHRs). AIM is pleased to provide comments on the proposed 2014 Edition EHR Standards and Certification Criteria.

- Page 83 of ONC EHR certification criteria list the content standards and specifications of certification. AIM supports the requirement of HL7 for new provider submissions in Stage 2. AIM supports the continued use of HL7 2.3.1 for providers already submitting to IIS as of October 1, 2013.
- Page 157 of ONC EHR certification criteria adopts Direct exchange as a transport standard with Simple Object Access Protocol (SOAP)-Based transport as an option. AIM believes that EHRs must be certified in Direct as well as SOAP web services. Many IIS systems prefer SOAP to Direct. SOAP web services requirements should include the Centers for Disease Control and Prevention (CDC)'s Transport Layer Expert Panel WSDL specifications.
- AIM strongly recommends the inclusion of the National Vaccine Advisory Committee (NVAC) approved Immunization Information System Core Data Elements as required elements in the final Standards for EHR certification.

We appreciate the opportunity to provide comments on the proposed 2014 Edition EHR Standards and Certification Criteria. If you have any questions or need additional information, please contact me at channan@immunizationmanagers.org.

Sincerely,

A handwritten signature in cursive script that reads "Claire Hannan".

Claire Hannan, MPH, AIM Executive Director