



AIRA
AMERICAN IMMUNIZATION
REGISTRY ASSOCIATION

May 21, 2020

National Quality Forum
1099 14th Street, NW
Suite 500
Washington, DC 20005

Comments to be submitted electronically at:

http://www.qualityforum.org/comments_By_Project.aspx?projectID=223&ActivityID=2081

RE: Endorsement of Prenatal Immunization Status and Adult Immunization Status, Prevention and Population Health Fall Cycle 2019

Dear National Quality Forum:

On behalf of the American Immunization Registry Association (AIRA), thank you for the opportunity to submit comments related to the National Quality Forum's decision to endorse immunization measures for pregnant women and adults. AIRA strongly supports the endorsement of both the Prenatal Immunization Status (PRS) and Adult Immunization Status (AIS) measures for endorsement by the NQF Prevention and Population Health Standing Committee.

These comments are a compilation of the input of our members which include over 80 organizations representing public health Immunization Information Systems (IIS), IIS implementers and vendors, non-profit organizations and partners. Immunization Information Systems interface with a broad range of stakeholders, including providers, pharmacists, schools, child care facilities, health plans and payers, among others. At the point of clinical care, an IIS provides consolidated immunization records and forecasts to support clinical decisions. At the population level, an IIS provides aggregate data and information on vaccinations for surveillance, program operations and public health action.

Diseases that are vaccine-preventable and are backed by vaccination recommendations from the Advisory Committee for Immunization Practices (ACIP) (i.e. influenza, pneumococcal, Tdap, and zoster) continue to cause preventable and unnecessary morbidity and mortality among adults, particularly our most vulnerable elderly populations. The recent introduction of "shared clinical decision-making" highlights the additional importance of needing to measure immunization rates carefully in order to measure the impact of that recommendation. COVID-19 has also heightened the awareness of vaccination and the need for assessing vaccination coverage for all ages, particularly adults.



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AIRA would like to emphasize the importance of using the IIS to contribute to more complete, quality vaccination data among adults to inform efforts to improve vaccine uptake, access and delivery. Composite measures put in place for childhood immunization status have helped to make great strides in vaccination coverage, and we expect a similar pattern for adults.

According to the 2019 Association of Immunization Managers (AIM) Annual Survey and additional state outreach, at least 37 states (74%) indicated they share data between the IIS and their state Medicaid agency and/or the state Medicaid agency uses IIS data for Medicaid reporting.¹ The feasibility of using IIS data for reporting prenatal and adult measures is further supported by the recent April 28, 2020 vote in favor of adding the PRS measure to the 2021 Medicaid core set. While the adult measure did not advance, the vote was very close, some states have already adopted the measure, and workgroup discussion demonstrated a commitment to advancing progress to support the AIS in the future.

Opportunities to capture adult vaccination data are increasing with broader adoption of interoperable electronic health record systems, and significant progress has been made related to the numbers of adults represented in IIS. In 2018, 56% of adults were represented in an IIS, compared to only 25 percent or less in 2010. At least 18 states and jurisdictions capture between 75% and 95% of adults further demonstrating progress. The percent participation among children improved from 82% in 2010 to 95% in 2018.

Thanks to recent legislative changes in two states, all IIS are now able to capture lifespan vaccination data. It takes time to capture comprehensive longitudinal data for a full population, and taking steps today will help ensure we achieve the progress we've made for children. The old adage, "what gets measured gets done", is extremely applicable in efforts to help to reduce the burden of vaccine-preventable diseases among adults. AIRA greatly appreciates the efforts of NQF to more accurately measure immunization status for adults. If you have questions regarding these comments, please contact [Liz Abbott](#), AIRA's Adult Program Manager.

Sincerely,

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

¹https://cdn.ymaws.com/www.immunizationmanagers.org/resource/resmgr/publications/Using_IIS_to_Assess_IZ_in_Me.pdf

