

December 20, 2023

David Mattiko, IIS Manager
Tom McCleaf, Immunization Program Manager
Pennsylvania Department of Health
Bureau of Communicable Diseases, Division of Immunizations
625 Forster Street
Harrisburg, PA 17120

Dear Mr. Mattiko and Mr. McCleaf,

On behalf of the 29 member companies of the HIMSS Electronic Health Record (EHR) Association, we appreciate the opportunity to offer feedback on the Pennsylvania Immunization Registry's transition to the Pennsylvania Immunization Electronic Registry System (PIERS).

As the national trade association of EHR developers, EHR Association member companies serve the vast majority of hospital, post-acute, specialty-specific, and ambulatory healthcare providers using EHRs and other health IT across the United States. Together, we work to improve the quality and efficiency of care through the adoption and use of innovative, interoperable, and secure health information technology.

In August 2023, our clients began receiving notifications about the shift from the current Statewide Immunization Information System (PA-SIIS) to the new PIERS, with the transition scheduled for January 2024. Upon learning of this, EHR Association member companies sought details such as specifications and timelines through outreach to the Pennsylvania Department of Health (PA DOH).

Regrettably, a number of our members faced challenges in obtaining timely information, with feedback arriving as late as October and full specifications not being received until December 6. While the initial communication from the PA DOH indicated the widespread use of WebIZ™ across 19 jurisdictions, variations in implementations to meet individual IIS requirements do occur and must be well understood.

Given these challenges and the chosen approach in employing a single cut-over without a transition period in which both SIIS and PIERS are fully available for submissions and queries, the EHR Association expresses significant concern about the achievability of the January 17, 2024 deadline. It is not realistic to ensure that all reporting providers will be ready to switch connections at the same time. As such, an information gap will emerge, impacting vaccine reporting and incomplete vaccination records queries for patients who received services from providers yet to transition.

AdvancedMD	CureMD	Flatiron Health	MEDITECH, Inc.	Oracle Health
Allscripts	eClinicalWorks	Foothold Technology	Modernizing Medicine	PointClickCare
Altera Digital Health	Elekta	Greenway Health	Netsmart	Sevocity
Athenahealth	EndoSoft	Harris Healthcare	Nextech	STI Computer Services
BestNotes	Epic	MatrixCare	NextGen Healthcare	Varian – A Siemens
CPSI	Experity	MEDHOST	Office Practicum	Healthineers Company

The EHR Association strongly urges the PA DOH to reconsider the deadline. An appropriate adjustment could either accommodate a transition period in which both registry systems remain available or provide adequate time to ensure that all providers and their systems are prepared to switch simultaneously. We ask that the PA DOH collaborate with providers and their system developers to establish a new, more feasible deadline.

The EHR Association is ready and willing to assist in facilitating a constructive discussion between the PA DOH and Association members supporting providers in Pennsylvania through this crucial transition. The Association's leadership can be reached by contacting Kasey Nicholoff at knicholoff@ehra.org, who can help identify a time that will work for all stakeholders.

Thank you for your consideration.

Sincerely,




David J. Bucciferro
Chair, EHR Association
Foothold Technology



William J. Hayes, M.D., M.B.A.
Vice Chair, EHR Association
CPSI

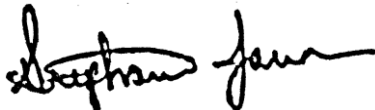
HIMSS EHR Association Executive Committee



Leigh Burchell
Altera Digital Health



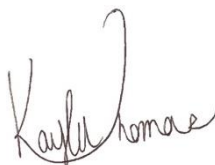
Cherie Holmes-Henry
NextGen Healthcare



Stephanie Jamison
Greenway Health



Ida Mantashi
Modernizing Medicine



Kayla Thomas
Oracle Health

Established in 2004, the Electronic Health Record (EHR) Association is comprised of 29 companies that supply the vast majority of EHRs to physicians' practices and hospitals across the United States. The EHR Association operates on the premise that the rapid, widespread adoption of EHRs will help improve the quality of patient care as well as the productivity and sustainability of the healthcare system as a key enabler of healthcare transformation. The EHR Association and its members are committed to supporting safe healthcare delivery, fostering continued innovation, and operating with high integrity in the market for our users and their patients and families. The EHR Association is a partner of HIMSS. For more information, visit www.ehra.org.