Get to Know Your IIS

These questions help program managers gain a foundational knowledge and understanding of the governance and oversight of the IIS. The information collected will be useful when developing and refining talking points and utilizing other communications tools.

Speak with your jurisdiction's legal team and IIS manager to answer these questions and discuss any known or perceived barriers to engaging with Medicaid or other stakeholders to share immunization data.

1. Is the IIS housed within and managed by the immunization program (IP), or is it centrally located and managed by a larger public health shared IT service?
   - If it is housed outside the IP, are the IIS and IP within the same governance structure or agency?

2. Are the IIS and Medicaid within the same governance structure or agency?
   - When they are not in the same governance structure, the legal authority and parameters to operate the data systems may differ due to different statutes, regulations, and other policies. This can lead to conflicting guidance or challenges relating to IIS-Medicaid data exchange.

3. Based on the answers to the first two questions, what, if any, HIPAA implications are there to consider?
   - In some instances, if the systems fall under the same HIPAA umbrella, there is less red tape to go through to share data.

4. What data use agreements (DUA) are needed to support cross-agency data sharing from the IP to the Medicaid agency?

5. What are the consent policies for the IIS? Is it an opt-in or opt-out IIS?
   - If the IIS is opt-in, you want to determine whether you can populate the IIS with data from Medicaid records not already in the IIS and how this could be handled when mixing the data.
   - There may be existing clinical data consent policies that may need to be aligned with IIS consent policies. Consider alignment and assess for potential conflicts with the consent policies across treatment, Medicaid payment and operations, and public health exceptions.

6. Who reports to the IIS? Are there mandatory reporting requirements for all providers, certain providers (i.e., pharmacies), or no mandatory reporting requirements?
   - Is IIS reporting mandatory for VFC providers?
   - Is reporting to the IIS required for children (<18 years) and/or adults?
   - There may be an opportunity to align the Medicaid provider requirements and registration process across the agencies to reduce administrative burden and increase reporting as a requirement for Medicaid reimbursement.

7. Who can access the IIS (on a view-only or edit basis), e.g., schools, child care centers, academic institutions, WIC, etc.
   - Is IIS access determined through policy at the immunization program level or legislation? Policies can be updated more easily and quicker than legislation that may require more planning and time.

8. Does the IIS obtain data from or report data to other states?
   - If so, which states does the IIS exchange data with?
   - If not, are there barriers to connecting to the CDC's Immunization Gateway (IZ Gateway) for exchange with other states and federal partners?

9. Is there legislation governing the IIS and/or current legislative proposals that might impact IIS functionality and reporting?
   - Find out how to become aware of proposed legislation that will impact immunizations, the immunization program, or IIS as soon as possible.
   - Educate leadership and decision makers who will help address specific challenges or who can provide strong support for or against a bill, identify supplemental resources, assist with regulatory changes, facilitate cross-agency collaboration, etc.

10. What improvements were made to the IIS during the pandemic?
    - What were the previous challenges before the pandemic?
    - Are there current challenges that are still outstanding?

11. Determine who is leading the Data Modernization Initiative (DMI) in your state to see how the IIS is incorporated into the DMI or other initiatives.
    - DMI has funding attached to it and could be an opportunity to supplement IIS funding for modernizing the IIS functionality and data exchange.