



March 22, 2021

Jeff Zients  
COVID-19 Recovery Team Coordinator  
The White House  
1600 Pennsylvania Avenue, NW  
Washington, D.C. 20500

Dear Mr. Zients:

Thank you for quickly taking the reins of the COVID-19 response and for your leadership to combat the coronavirus and quickly reopen economic activity. On behalf of the Health Innovation Alliance (HIA) and our diverse membership of patient groups, health providers, technology companies, employers, insurers, and other stakeholders, we write to share our support of your goals to immunize the population and restart the economy as quickly as possible. With the onset of the global COVID-19 pandemic, HIA's membership used its expertise to develop sound policy to encourage utilization of the innovative technologies needed to stem the tide of the pandemic and get Americans safely back to living their lives.

One way to quickly reopen is through digital vaccine cards (DVC). With vaccinations increasing and economies opening, particularly in the service and travel industries, there is a demand among policymakers, consumers, and businesses to validate who has been vaccinated against COVID-19. The value these DVCs can provide will allow consumers to access critical pieces of the economy such as sporting events, travel, restaurants, and others in a manner that can limit further spread while assisting these vital industries to recover. Perhaps more importantly, DVCs will help all employers, whether they are in services, hospitality, building or manufacturing, safely reopen.

We write to request that the Department of Health and Human Services through its Office of the National Coordinator (ONC) issue guidance to ensure digital vaccine cards meet standards to ensure their usefulness and accuracy. ONC should detail criteria for valid vaccination and testing passport applications based on existing private sector standards and sound information management principles.

Specifically, we seek to work with the Administration on developing federal guidance on the following issues:

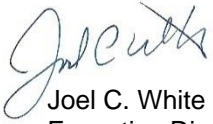
1. Standards for secure interoperability and use of data used for DVCs across applications and geographic jurisdictions. This is important for travel and for multi-state employers.
2. Rules for data storage, sale, and other purpose use to ensure user privacy and security.
3. Simple and secure identity management and verification
4. Data provenance standards to ensure actual vaccination and testing data supported by vaccine registries and claims information is used to verify safety. Ideally, data would be drawn from immunization registries to ensure accuracy and to verify administration.
5. Bidirectional exchange standards to ensure data flows from providers, including pharmacies and pharmacists, to IIS, where consolidated patient immunization histories are retained, to include the Covid-19 immunizations and lab systems and back again.

Simply put, digital vaccine cards will not be trusted if different standards and questionable data mark their reliability.

HIA's public health work has evolved to include different forms of testing, enhanced data exchange techniques, real-time results communication, and most recently, vaccine distribution and DVC creation. These policies will move us forward in stopping the spread of the current pandemic and preparing us for any future public health emergencies.

We look forward to working with you on these issues as the Biden Administration seeks to assist employers and employees reopen quickly and safely.

Sincerely,



Joel C. White  
Executive Director

CC:

The Honorable Xavier Becerra  
Secretary, U.S. Department of Health and Human  
Services  
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