

**Working Together on Data
Exchange: a Guide to
Indian Health Service (IHS)
and
State Immunization
Information System (SIIS)
Interfaces**

Developed by the
IHS Immunization Program,
IHS Division of Epidemiology and Disease Prevention
Albuquerque, NM

Dear Colleague:

The Indian Health Service (IHS) National Immunization Program is a partnership between the Centers for Disease Control and Prevention (CDC) and IHS, working with IHS, tribal and urban Indian (I/T/U) immunization programs across the country. The program is based in the IHS Division of Epidemiology and Disease Prevention in Albuquerque, NM and the staff are assignees from the CDC Immunization Services Division.

As HHS agencies, CDC and the IHS are committed to the Healthy People 2010 objective to “increase to 95% the proportion of children aged <6 years who participate in fully operational, population-based immunization registries” (Objective 14-26). To this end, CDC funds states and provides technical assistance to develop and maintain state immunization information systems (SIIS), or registries. Recognizing the value of SIIS, the 2006-2011 IHS Strategic Plan seeks to achieve interoperability between disparate systems, and supports developing and supporting ongoing data sharing relationships with tribal, state, federal and private entities, including facilitating the exchange of immunization data with SIIS.

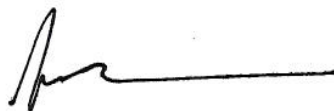
What follows is a guide to the IHS initiative to establish immunization data interfaces between SIIS and the IHS Resource and Patient Management System (RPMS) used by many I/T/U healthcare facilities nationwide. It is designed to introduce the initiative, familiarize personnel with the software and participation requirements, and create a foundation for further discussions between SIIS personnel and the IHS Immunization Program.

IHS recognizes that SIIS are a critical tool for increasing and sustaining vaccination coverage and we look forward to working together towards RPMS/SIIS interfaces.

Sincerely,



Cecile Town, MPH
IHS Immunization Registry Coordinator



Amy Groom, MPH
IHS Immunization Program Manager

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The Indian Health Service (IHS) Immunization Data Interface

Background

Medical record scattering is a common problem and can affect patient care. For immunizations, incomplete information can lead to over or under immunization and wasted resources. CDC has supported the development of state immunization information systems (SIIS) to address these issues.

The Indian Health Service (IHS) supports an electronic medical record, called the Resource and Patient Management System (RPMS), which is used by many IHS Tribal and Urban Indian (I/T/U) programs. The RPMS contains an immunization module for entering and tracking immunizations, and data are stored at the local facility. RPMS data are usually not included in SIIS as it may not be feasible for sites to enter the immunizations they provide into 2 systems (the RPMS and the SIIS).

The IHS Immunization Data Exchange initiative has resulted in the development of software to enable an automated, two-way batch RPMS/SIIS interface. The IHS immunization data exchange software, called BYIM, extracts immunization data from the RPMS system and sends a batch file to the SIIS using standard Health Level Seven (HL7) messages in accordance with CDC's national immunization registry data exchange standards. In response to the data sent from the RPMS, the SIIS creates a file of immunizations missing in the RPMS data to be retrieved by the I/T/U facility. This information can then be downloaded into the RPMS, alleviating the need for staff to enter the information into the RPMS, and ensuring that a patient's complete immunization history is available to the provider.

This software was released nationally in March 2006 and an updated version will be available in 2007. This initiative will improve patient care by providing more complete immunization data on children served by I/T/U sites to all providers, thereby ensuring appropriate immunization.

What follows is a guide developed by the IHS Immunization Program for states and I/T/U sites who are interested in using HL7 messaging to do bi-directional immunization data interfaces.

Software Needed – all installed at IHS sites

1 – Immunization module of the IHS Resource and Patient Management System (RPMS)

- An RPMS module designed to record, store and manage patient immunization information
- Information entered into the package is integrated into other health information in RPMS such as laboratory, pharmacy, etc.
- Functions include:
 - Tracking and forecasting of immunizations
 - Immunization coverage reports
 - Reminder/ recall letters
 - Due lists
 - Doses Administered Report
 - Vaccine Inventory

2- IHS Immunization Data Exchange (BYIM) software

- Bi-directional
- HL7 Message (2.4)
- Batch files extracted from IHS RPMS
- Conforms to CDC's *Standard Protocol for Immunization Data Transactions Using HL7*
- Uses HTTPS to transfer files
- Relies on state de-duplication process
- State sends reciprocal file with any new immunizations
- Data “reviewed” and imported into RPMS

Note: The SIIS cannot connect independently to the IHS RPMS servers. The IHS site must initiate an HTTPS connection to the SIIS before receipt of the return message can take place.

3 – HL7 Communications Bridge software

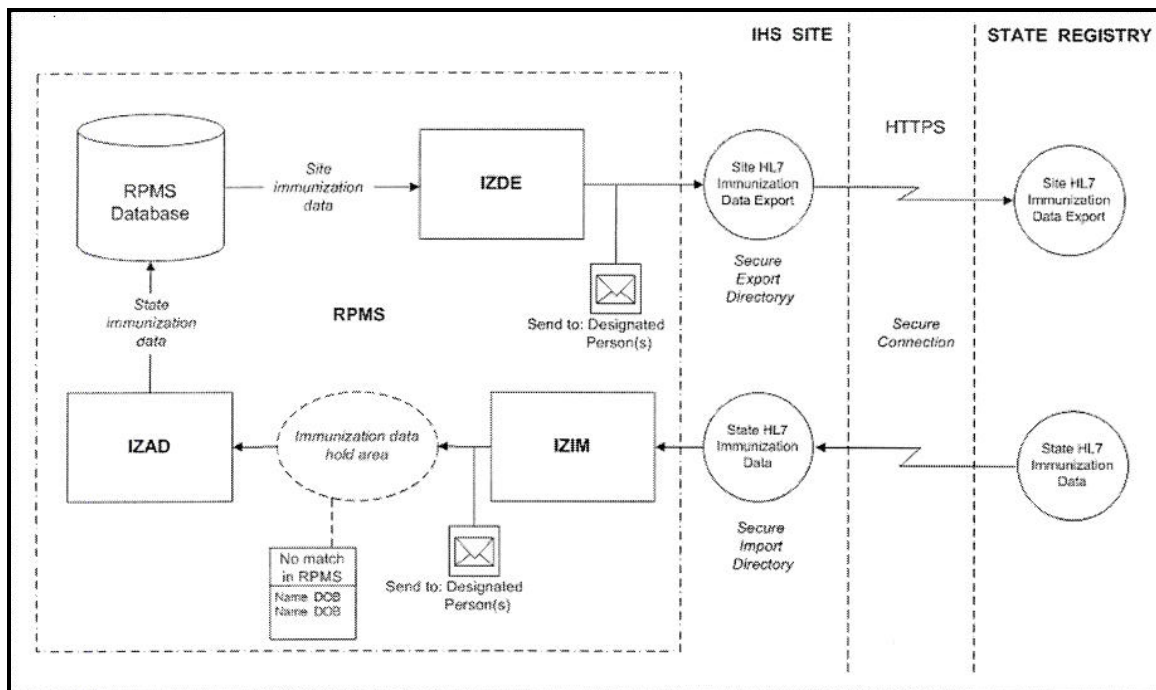
- An IHS-licensed STC software product that automates the interface on the IHS side
- License covers any IHS, tribal or urban site that uses RPMS
- Operates in conjunction with BYIM 1.01
- Enabled via a secure HTTPS connection that connects with the state registry. The SIIS must provide the secure HTTPS connection.
- Downloaded at the IHS site
- No cost to the state to support

These software products are provided to sites by the IHS, and are designed to be used in conjunction with one another to exchange immunization data with the SIIS. SIIS programmers and developers will need to be involved early on to determine the interoperability of the IHS software with the SIIS. The IHS Immunization Registry Coordinator can facilitate communication between SIIS and IHS personnel as needed.

Immunization Data Interface: The Process

The IHS Immunization Data Exchange Software, referred to as BYIM, is installed at participating I/T/U sites. Each site will also install the HL7 Communications Bridge software, which works with the BYIM to bi-directionally automate the interface in states with a secure web portal.

1. With the IHS BYIM, the user exports a file consisting of the entire immunization record for all patients < 19 years with a visit since the last export to a secure export directory (IZDE command). The frequency of exports is determined by each facility. Daily exports are recommended.
2. The HL7 Communications Bridge detects a file in the export directory and connects it to the state registry through a secure internet HTTPS connection, which then transmits the file as an HL7 batch file.
3. The state registry or SIIS receives the file via HTTPS and parses the data.
4. At the same time and on the same secure HTTPS connection, the HL7 Bridge will pick up an import file (if one is present) from the SIIS and place the file into the import folder in a secure local directory. This file includes any vaccines sent to the SIIS by other providers since the site's last SIIS import.
5. Using the BYIM IZIM command, the SIIS reciprocal file is imported into RPMS. The data are extracted and BYIM matches the patients in the SIIS file with patients in the RPMS, places the data in a holding area, and sends an email notification that the immunization data have been imported into RPMS. Any non-matching patients are written to a list.
6. An I/T/U clinical person with immunization expertise reviews the individual patient vaccine data and adds it into the individual patient's electronic RPMS record (IZAD command). This process can be automated at the I/T/U clinic level.



Participation Requirements for establishing an interface between the IHS RPMS and SIIS

I/T/U sites should:

1. Use the IHS Resource and Patient Management System (RPMS)
2. Designate an IT contact who can work to download, install and set-up the BYIM and Bridge software, as well as enable the site's SIIS account.
3. Designate a clinical contact who will conduct exchange activities. Such as: generating the RPMS export and reviewing and adding data received back from the state into RPMS. This person will need to familiarize themselves with the BYIM software.
4. Download and install BYIM v 1.01
5. Download and install the HL7 Communications Bridge software
6. Set up a registry account with the SIIS
7. Coordinate with the SIIS for test messaging
8. Run reports before and after initial data exchange for submission to the IHS Immunization Program
9. Communicate with the IHS Immunization Registry Coordinator for technical assistance

SIIS should:

1. Have the capability to send & receive HL7 batch messages
2. Have a secure web site/portal to support the Bridge connection
3. Complete an IHS Interconnection Security Agreement (ISA) and update it annually. Where applicable, the IHS Immunization Registry Coordinator will provide this document.
4. Have the ability to track the patients sent to the SIIS by keeping a log of all the patients each site sends to the registry
5. Have the ability to send a reciprocal file back to each site that includes data from other providers the patient visited. This will be new data that was not contained in the export from the site.
6. For the reciprocal file, the SIIS should send back the same patient demographic data provided in the RPMS export file, not the demographic data contained in the SIIS. This will aid the IHS matching algorithm in BYIM.
7. As with other participants, provide I/T/U sites access to the SIIS.
8. Communicate with IHS Immunization Program staff, I/T/U site IT staff, programmers and developers to facilitate the testing process.
9. Provide technical support to I/T/U site users in the set-up, testing and use of the registry.

The IHS Immunization Program will coordinate communication with regard to data exchange and facilitate technical assistance.

Getting Started with Data Exchange

People work together on many levels to establish, build, test and maintain the data exchange process. From our experience, the SIIS, the IHS National level Data Exchange Team (DET) and the IHS, Tribal or Urban (I/T/U) site teams all have programmatic as well as technical personnel who work together at various stages towards a successful interface.

Stage 1 – Initial Q & A

This involves the initial communication indicating interest and determining interoperability (see pg. 4). SIIS personnel will communicate with the IHS DET, via the Immunization Registry Coordinator. At this time, the IHS DET will also work with the SIIS to complete the IHS Interconnection Security Agreement (ISA) in states where this is applicable (see pg. 9)

Stage 2 – Getting Started - SIIS

States will engage their SIIS personnel in conference calls with the IHS DET (Immunization Registry Coordinator, Developers, Programmers, Contractors) so that the technical staff are able to determine system specifications that will enable data exchange. A timeline for testing is established.

Stage 2 – Getting Started – I/T/U

I/T/U sites that would like to establish an interface with the SIIS begin to work with the IHS DET to get set up by establishing IT & clinical contacts for the exchange process and installing the BYIM and Bridge software. After the software is installed, the I/T/U site must also work with the SIIS personnel to establish a site account with the SIIS and a secure HTTPS connection for the Bridge.

Stage 3 – Test Messaging

The IHS DET will work with the I/T/U site to send a sample test message to the SIIS. SIIS personnel may also be involved. When this is done successfully, the IHS DET contacts the SIIS personnel to begin the testing phase using real RPMS immunization data. At this time, the IHS DET trains the I/T/U site contacts on running BYIM for the interface.

Stage 4 – Testing Phase

The I/T/U site contact will examine data received back from the SIIS prior to adding it back to RPMS. If issues arise, the I/T/U site will work with the IHS DET or the SIIS personnel as necessary.

Stage 5 - Production

Once the process can occur without “bumps”, the site is ready to automate the exchange by engaging the HL7 Communications Bridge Software, which should already be installed.

Sample Test Message, HL7 Format

IHS sends to the IIS

```
FHS|^~\&|IZ REGISTER|CHINLE HOSP|||20070807043010-0700
BHS|^~\&|IZ REGISTER|CHINLE HOSP|||20070807043010-0700
MSH|^~\&|IMMUNIZATION REGISTER|CHINLE HOSP|||20061219043046-0700|VXU^V04|IHS-3914454|P|2.4|||AL|AL|
PID|1|111694|808101111694^^^^MR|DEMO^PATIENT^MIDDLE^^^|DEMO^MOTHER^MIDDLE^^^|20061104|F||1002-5|BOX
XYZ^^CHINLE^AZ^86503|||999887777|
NK1|1|DEMO^MOTHER^MIDDLE^^^|MTH^MOTHER^HL70063|BOX XYZ^^CHINLE^AZ^86503|928 594 9999 C||NOK^NEXT OF
KIN^99IHS|
RXA|0|1|20061218133600|19890620120000|110^DTaP-Hep B-IPV^CVX|.5|||00^NEW IMMUNIZATION RECORD^NIP001||CHINLE
HOSP^^^CHINLE HOSP|||AC21B074AA|SKB^GLAXOSMITHKLINE^MVX|
RXA|0|1|20061218133600|19890620120000|49^HIB (PRP-OMP)^CVX|.5|||00^NEW IMMUNIZATION RECORD^NIP001||CHINLE
HOSP^^^CHINLE HOSP|||0403F|MSD^MERCK & CO.^MVX|
RXA|0|1|20061218133600|19890620120000|100^PNEUMOCOCCAL CONJUGATE^CVX|.5|||00^NEW IMMUNIZATION
RECORD^NIP001||CHINLE HOSP^^^CHINLE HOSP|||B08675H|WAL^WYETH-AYERST^MVX|
RXA|0|1|20061218133600|19890620120000|116^ROTAVIRUS, PENTAVALENT^CVX|2|||00^NEW IMMUNIZATION
RECORD^NIP001||CHINLE HOSP^^^CHINLE HOSP|||0776F|MSD^MERCK & CO.^MVX|
MSH|^~\&|IMMUNIZATION REGISTER|CHINLE HOSP|||20061219043046-0700|VXU^V04|IHS-3914453|P|2.4|||AL|AL|
PID|1|111694|808101111694^^^^MR|DEMO^PATIENT2^MIDDLE^^^|DEMO^MOTHER2^MIDDLE^^^|20051204|F||1002-5|BOX
XYZ^^CHINLE^AZ^86503|||999887777|
NK1|1|DEMO^MOTHER2^MIDDLE^^^|MTH^MOTHER^HL70063|BOX XYZ^^CHINLE^AZ^86503|928 594 9999 C||NOK^NEXT OF
KIN^99IHS|
RXA|0|1|20060324120000|19890620120000|110^DTaP-Hep B-IPV^CVX|999|||01^HISTORICAL INFORMATION - SOURCE
UNSPECIF^NIP001||OTHER^^^OTHER|||^^MVX|
RXA|0|1|20060526120000|19890620120000|110^DTaP-Hep B-IPV^CVX|999|||01^HISTORICAL INFORMATION - SOURCE
UNSPECIF^NIP001||OTHER^^^OTHER|||^^MVX|
RXA|0|1|20060726120000|19890620120000|110^DTaP-Hep B-IPV^CVX|999|||01^HISTORICAL INFORMATION - SOURCE
UNSPECIF^NIP001||OTHER^^^OTHER|||^^MVX|
BTS|399
FTS|1
```

Where:

FHS = File Header Segment	NK1 = Next of Kin/Associated Parties Segment
BHS = Batch Header Segment	RXA = Pharmacy Administration Segment
MSH = Message Header Segment	BTS = Batch Trailer Segment
PID = Patient Identification Segment	FTS = File Trailer Segment

Variables that IHS sends to the SIIS:

FHS File Header Segment

1. File Field separator = |
2. File Encoding Characters
3. File Sending Application
4. File Sending Facility
5. Not used File Receiving Application
6. Not used File Receiving Facility
7. File Creation Date/Time
8. Not used File Security
9. Not used File Name/ID/Type
10. Not used File comment
11. Not used File Control ID
12. Not used Reference File Control ID

MSH Message Header Segment

1. Field separator
2. Encoding Characters
3. Sending Application
4. Sending Facility
5. Receiving Application
6. Receiving Facility
7. Date/Time of Message
8. Not used Security Type
9. Message type
10. Message Control ID 3
11. Processing ID
12. Version ID
- 13 – 14 Not used
15. Accept Acknowledgement type = AL
16. Application Acknowledgement type = AL

PID Patient Identification Segment

1. Set ID – PID
2. Patient ID = local/RPMS 6 digit Med Record #
3. Patient Identifier list
4. Alternate patient ID – PID
5. Lastname^firstname^middle (patient name)
6. Lastname^firstname (mother's maiden name)
7. Date of birth
8. Sex (M or F or Unknown)
9. Not used Patient Alias
10. Race = 1002-5 = AI/AN
11. Mailing Address
- 12 – 18 Not used
19. SSN Patient

NK Next of Kin/Associated Parties Segment

1. Set ID NK1
2. Lastname^Firstname
3. Relationship = example MTH^MOTHER^70063
4. Mailing address
5. Phone Number
6. Not used = Business Phone Number
7. Contact Role NOK^NEXT OF KIN^99IHS
- 8 – 32. Contact data elements – Not Used

RXA Pharmacy Administration Segment

1. 0
2. Not used
3. Date of Vaccine
4. Date of data transfer
5. Vaccine CVX code^Vaccine name^CVX = 03^MMR^CVX
- 6 – 8 Not Used
9. 01 = Historical 00 = Administered
10. Not used
11. Facility
- 12 -14 Not used
15. Lot #
16. Not used
17. Manufacturer --- see MVX if Lot # was documented

Data sharing agreements with I/T/U partners

The IHS recognizes that under HIPAA, sharing immunization data with state registries is permitted and the IHS Strategic Plan 2006 – 2011 specifically supports data sharing relationships with entities such as immunization registries. To that end, the agency issued a policy memo (Appendix A) which states that sharing data with state registries is permitted and encouraged.

However, there is no requirement for I/T/U facilities to share data with states. From the policy memo:

“disclosures made pursuant to a routine use are discretionary, not mandatory”

This statement takes into account the sovereignty of each tribal nation and their individual government to government relationships with the United States. Related to data exchange, it means that ultimately, participation is determined by the tribe.

Separate from any Memorandums of Understanding (MOU) that a SIIS may require from registry participants, the IHS will require an Interconnection Security Agreement (ISA) from state registries who will establish immunization data interfaces with IHS facilities in their state. While a MOU will cover organizational responsibilities and scope of work, an ISA will identify and implement information security safeguards and responsibilities required for the establishment of the interface.

With consideration to the IHS infrastructure in various states, it may not be a requirement for each state to complete an ISA. Please contact Cecile Town, IHS Immunization Registry Coordinator, at (505) 248-4233, for more information about the ISA.

IHS Data Exchange FAQs

1. What is the IHS Immunization Data Exchange System?

The IHS Immunization Data Exchange System (BYIM) is software developed by IHS to create CDC compliant HL7 messaging to facilitate bi-directional immunization interfaces with SIIS. The software is loaded at the I/T/U site and extracts immunization data from the RPMS and converts it into an HL7 message file. This file can then be sent to the SIIS. The SIIS in turn generates a file with immunization data for those patients that were missing in the RPMS file, and sends it to the site for importation into RPMS.

2. In what states is this working?

Beta – testing of BYIM was completed at pilot sites in AZ, MN, WA and WI. This software is available for use by all I/T/U sites that use RPMS. In AZ and WA data exchange has expanded beyond the initial pilot sites. As of January 2007, 16 sites in AZ and 8 sites in WA were exchanging data with the SIIS using the BYIM and Bridge software.

3. What is the format of the HL7 messages generated by BYIM?

BYIM generates HL7 messages following the standards laid out by the CDC in the Implementation Guide for HL7 messages

<http://www.cdc.gov/vaccines/programs/iis/stds/downloads/hl7guide.pdf>

4. What version of HL7 is used?

BYIM uses HL7 Version 2.4

5. What patients are included in each file? Do the files just contain new immunizations since the last export, or all immunizations?

The initial file sent from RPMS to the SIIS will include all patients < 19 years, and will include the complete immunization history for each patient. For subsequent exports, BYIM sends the complete immunization history for any patient < 19 years who has had a clinic visit since the last export, regardless of whether or not they received an immunization at the visit.

6. How are the files transmitted?

There are two ways the data are sent from the RPMS to the state: a “manual” process, and an “automated” process. The manual process requires someone to log on to the state site and transfer the data file each time it is generated. They must also log on to collect the state’s return file before integrating it back into RPMS.

The automated process uses an HL7 Communications Bridge to establish an HTTPS connection to a state’s secure web portal. Through this connection, data can be sent to the state and also retrieved from the state and transferred back to the RPMS (see Immunization Data Interface: The Process p. 3).

7. Will IHS be sending batch files or will data be exchanged in real time?

The BYIM software currently sends batch files. Frequency of batch file transmission can be determined by the site.

8. Does the BYIM software need to be loaded on the SIIS for this to work?

No. The BYIM software is loaded only on the RPMS side. However, states may need to make modifications or enhancements to their SIIS in order for their SIIS to correctly interpret the HL7 2.4 vaccine data message and load the vaccine data into their SIIS.

9. Will we need funds to get this up and running in my state?

It depends. IHS has a contract for general technical support to roll out to I/T/U sites using RPMS, so costs on the I/T/U end are covered. However, if a state needs to modify their SIIS for this interface, the state will need to support those costs.

10. Will the RPMS data we receive from I/T/U sites be de-duplicated?

No. There is no state-level repository of information for I/T/U RPMS data. Each site will send their information directly to the SIIS. The SIIS will need to de-duplicate data.

11. How can I get this going in my state?

The first step is to review “Working Together on Data Exchange: a Guide to IHS and SIIS Interfaces”, to ensure your registry has the ability to receive and send the CDC approved HL7 messages using a HTTPS secure connection. Initially, we recommend that the interface is piloted at one I/T/U site in the state. It is important to identify a site that has good IT support and a supportive clinical person who can review and understand immunization data to ensure the process is working correctly.

12. Can tribal or urban Indian health programs also participate in the interface?

Yes. The BYIM and HL7 Communications Bridge software can be used by any healthcare site in the I/T/U Indian healthcare system that uses RPMS. I/T/U sites who do not use RPMS should contact the SIIS for more information about participation.

13. Who can I contact for more information?

IHS has an immunization registry coordinator who serves as the central point of contact for all exchange inquiries:

Cecile Town, MPH - IHS Immunization Registry Coordinator

e-mail: Cecile.Town@ihs.gov

Phone: (505) 248 – 4233

She can refer state and IHS partners, as needed, to the other members of the IHS Data Exchange team: Amy Groom, MPH - IHS Immunization Program, Albuquerque, NM; Scott Hamstra, MD – Sells Indian Hospital, Tucson, AZ; John Parker, RN - Chinle Comprehensive Health Care Facility, Chinle, AZ

Appendix A: The IHS Data Sharing Policy Memo



AUG 14 2001

TO: See Below

FROM: Privacy Act Officer, IHS

SUBJECT: Clarification of September 11, 2000 Policy Statement for Sharing Indian Health Service Data with State Health Department Immunization and Other Registries

This memorandum supercedes the September 11, 2000 memorandum issued by the IHS Chief Medical Officer, subject: Policy statement for sharing IHS data with State Health Department Immunization and Other Registries. This action is prompted by the numerous concerns and questions raised by IHS Area and Service Unit staff and IHS Office of General Counsel (OGC) Regional Attorney staff concerning the guidance and their requests for clarification of the guidance.

The following provides guidance regarding the sharing of IHS patient data with State and other registries, e.g., a State health department immunization, cancer, STD, birth defect, or other health care registry and is effective immediately.

In a July 21, 1998 memorandum to the IHS Privacy Act Officer, the Office of the General Council (OGC) provided general guidance concerning data-sharing with State or other registries. OGC suggested that IHS may disclose its health data with State and other registries in accordance with routine use nos. 1 or 7 contained in Privacy Act System of Records-Health and Medical Records Systems, 09-17-0001. 58 FR 36208 (July 6, 1993). However, IHS must first ascertain that the registry fulfills routine use nos. 1 or 7 criteria discussed below.

Routine Use I: *"Records may be disclosed to State, local or other authorized organizations which provide health services to American Indians and Alaska Natives or provide third-party reimbursement or fiscal intermediary functions, for the purpose of planning for or providing such services, billing or collecting third-party reimbursements and reporting results of*

medical examination and treatment." In order for IHS to disclose patient data to a State or other health care registry pursuant to routine use no. 1:

- the registry must be established by a State, local or other "authorized" organization, and
- this registry must be part of a system that plans for, provides, or pays for health services, and
- the purpose of the IHS disclosure to the registry must be so that the registry may (a) plan for or provide health services, or (b) provide payment for health services, or (c) report the results of medical examination and treatment.

OGC suggests that although some registries may not appear to fulfill the health services' criteria of routine use no. 1. Most registries do report the results of medical examinations and, on that general basis, IHS may disclose information in accordance with routine use no. 1.

Routine Use VII: *"The IHS health care providers may disclose information from these records regarding the commission of crimes or the occurrence of communicable diseases, tumors, suspected child abuse, births, deaths, alcohol or drug abuse etc., as required by Federal law or regulation or State or local law or regulation of the jurisdiction in which the facility is located. Disclosure may be made to organizations as specified by the law or regulation, such as births and deaths to State or local health departments, and crimes to law enforcement agencies."* In order for IHS to disclose patient data to a State or other health care registry pursuant to routine use no. 7:

- the data regards the commission of crimes or the occurrence of communicable diseases, tumors, suspected child abuse, births, deaths, alcohol or drug abuse etc.

Page 3 - Addressees

- the data is required by Federal law or regulation or State or local law or regulation of the jurisdiction in which the facility is located.
- the Disclosure is made to organizations as specified by the law or regulation, such as births and deaths to State or local health departments, and crimes to law enforcement agencies."

Routine use no. 7 allows IHS to disclose certain information where there is a Federal, State, or local statute or regulations which mandates the IHS facility to report the data. The data may only be reported to the organization or agency listed in the statute or regulation. IHS should require the registry to identify its legal authority for collecting the information.

In summary, OGC recommends that (1) IHS may obtain the patient's written consent to share the information with the registry when the health care provider has contact with the patient, or (2) the disclosures to the registry meets the criteria of routine uses no. 1 or 7.

It is also important to state that disclosures made pursuant to a routine use are discretionary not mandatory. Accordingly, the decision to share IHS patient data with the requesting organization's registry is made at the discretion of the appropriate Privacy Act system manager. At the Area level, this is the Area Director. At the Service Unit Level, this is the Service Unit Director/CEO.

If there are any questions regarding this memorandum, please contact Mr. William Tibbitts, Privacy Act Officer, Rockville, Maryland, at (301) 443-1116.

A handwritten signature in cursive script, appearing to read "William Tibbitts".

Addressees:

Area Directors
Area Chief Medical Officers
Service Unit Directors/CEO's
OGC Regional Attorneys - IHS
Area Privacy Act Advocates