LF PUBLIC HEALTH

**DATE:** February 3rd, 2021

**TO:** Jeff Zients, Coordinator of the COVID-19 Response and Counselor to the President

**FROM:** Brian Behlendorf, Executive Director, Linux Foundation Public Health (LFPH)

**CC:** Xavier Becerra, Nominee for Secretary, Department of Health and Human Services (HHS)
Norris Cochran, Acting Secretary, HHS
Sean McCluskie, Chief of Staff, HHS
Micky Tripathi, National Coordinator for Health Information Technology (ONC)
Rochelle Walensky, Director, Centers for Disease Control and Prevention (CDC)
Janet Woodcock, Acting Commissioner, Food and Drug Administration (FDA)
David Peter Pekoske, Acting Secretary, Department of Homeland Security (DHS)
Marcella Nunez-Smith, Chair, COVID-19 Health Equity Task Force

**SUBJECT:** LFPH Calls for Coordination of Digital Vaccination Records Using Open Standards

Linux Foundation Public Health, an initiative of the non-profit Linux Foundation, supports public health authorities (PHAs) in their fight against the COVID-19 pandemic, through the use of open standards and open source technology. We are responding to the recent White House National Strategy on COVID19 and a number of the companion Executive Orders (EOs):

- EO on Promoting COVID-19 Safety in Domestic and International Travel [1]
- EO on Organizing and Mobilizing the U.S. Government to Provide a Unified and Effective Response to Combat COVID-19 and to Provide U.S. Leadership on Global Health and Security [2]
- EO on Ensuring an Equitable Pandemic Response and Recovery [3]

The U.S. federal government can accelerate a safe reopening by directing PHAs to issue digital vaccination records using the international standard known as Verifiable Credentials (VCs), and by coordinating a US-wide framework for their interoperability. This will enable individuals to prove COVID-19 vaccination (or even test results) digitally anywhere, and provide a fraud-resistant, privacy-protecting and equitable enhancement to existing paper systems.

Some states and other countries have started to pilot this approach, as have various industries like film and aviation. But, the inconsistent use of standards and varying implementations have already led to confusion and public concern. An effort coordinated at the federal level would lead most quickly to uniform adoption and true inter-state and cross-domain interoperability.

**LFPH and our partner organizations are ready to collaborate with you on this.**

A partnership between the White House COVID-19 team, the agencies represented on the Cc, state/local PHAs and the LFPH community could result in coordinated deployments across all 50 states that appropriately leverage the innovation and drive of the private sector, build a durable shared platform, protect privacy and enhance social equity.

For more specifics, see the following attached background. I look forward to discussing further.

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## Background:

### The open standard that can accelerate a safe and equitable reopening.

Defined by the W3C, VCs have been deployed in both the public and private sectors, as they enable interoperable, tamper-evident and user-centric identity systems. For examples, see their use by DHS and GLEIF. COVID-19 has accelerated the consideration and deployment of VCs as organizations, including IATA and WHO, and alliances, such as the COVID-19 Credentials Initiative (CCI) and MITRE's Vaccination Credential Initiative, who have all converged on VCs as a suitable technology.

VCs can support any kind of data, including vaccinations and medical test results. Their unique architecture, combined with modern cryptography, guarantees the authenticity of credentials and eliminates privacy concerns that many have. They are easy to deploy by leveraging existing data and infrastructure and are part of a long-term foundation for public health infrastructure. For those without a smartphone or access to the internet, VCs can also be represented on paper or in physical cards and verified digitally online or offline. There are no intellectual property constraints on their use, and they can be deployed in a vendor-neutral manner.

### Federal leadership is needed for successful VC rollout.

Federal leadership is key to ensuring jurisdictions adopt open standards and foster interoperability. Vaccinations make an ideal starting point due to federal oversight of the vaccination program and ability to leverage the robust national immunization data infrastructure. Federal agencies cc'd here and jurisdictional PHAs should take the relevant and impactful next steps below:

- **Identify where from within the Information Systems and Data Flow for COVID-19 Vaccine Distribution and Administration VC generation should be included.** VC issuance could occur from a jurisdictional IIS repository or from the IZ Gateway. By mapping out options and conducting technical and risk analysis, an effective pathway can be selected and authorities can be established to lead the implementation.
- **Define data attributes that should be included in a VC based on the CDC requirements for reporting and verification needs.** A national credential schema containing minimal data elements needs to be defined to ensure nationwide data interoperability. This should align with the global standard being discussed at the WHO.
- **Create fundamental principles needed to ensure effective and equitable implementation.** The federal government should provide a trust framework template that stipulates the most important rules and guidelines that jurisdictional PHAs need to follow when implementing VCs and allow them to create jurisdiction-specific policies.

A safe and equitable reopening requires more than proof of vaccination — VC-based test results, which are already in use and driven by private sector solution providers, should be included once the basic VC structures and systems are set with vaccination.

## LFPH has a proven model and a community of experts ready to help.

LFPH has built an effective public-private partnership model and a global network of PHAs. In mid-2020 we successfully launched a set of "exposure notification" applications that utilize the Google/Apple Exposure Notification interface. These apps are now the standard mobile public health application in New York State, New Jersey, Pennsylvania, and Delaware, along with Ireland, Canada, and New Zealand, among many others.

LFPH hosts CCI, a volunteer community of VC veterans who have been developing VC-based COVID-19 solutions since April of 2020. By working closely with public health professionals and global initiatives, including the WHO Smart Vaccination Certificate group, LFPH:CCI ensures PHAs have sufficient support to deploy VCs, and is ready to do any work that would help the federal government evaluate and implement a VC system.

Thank you.