



A.279-A/S.75-A (Gottfried/Hoylman)

AN ACT to amend the public health law, in relation to adult immunization reporting requirements

The New York State Association of County Health Officials (NYSACHO) strongly supports the above-referenced legislative proposal, which would amend the public health law to require that all authorized health care professionals report immunizations to adults over the age of 19 to the New York State Immunization Information System (NYSIIS) or the City Immunization Registry (CIR).

NYSIIS, and the CIR collect and store immunization records for all New Yorkers. NYSIIS provides a complete, accurate, secure and real-time immunization record that is easily accessible by any health care provider or public health professional, and allows patients timely access to an up to date copy of the vaccines they have received. It allows providers to identify what vaccines a patient has received and which one they may need. For those adults who had childhood immunizations entered into NYSIIS, it allows access to a complete record of both childhood and adult vaccinations. It also provides official documentation of the vaccine record, when needed for employment or post- secondary education enrollment.

Most importantly, if an adult is exposed to a vaccine-preventable disease, NYSIIS records can quickly provide public health professionals and health care providers information on whether or not an exposed adult needs vaccination and other preventive measures to protect themselves and loved ones from potentially life-threatening illnesses. The COVID-19 pandemic highlight the importance for individuals, health care professionals and public health officials to have real-time access to vaccine records for adults, as well as children if they are to prevent the spread of vaccine-preventable diseases.

Adults are more likely to see multiple health care providers. This provides them with more opportunities to receive needed vaccinations, but also makes it more challenging to track which vaccines they have received. This proposal would further ensure accuracy of patient records, increasing the level and appropriateness of care patients receive. Tracking of adult immunizations through mandated reporting would also aid in identifying geographic areas and populations where vaccine coverage is low, thus allowing local health departments and providers to more effectively target resources to reducing health disparities. This in turn will prevent the spread of vaccine preventable diseases through increased adult immunization rates.

NYSIIS provides an accessible and consistent means to report. In order for the registry to maintain accurate data and for professionals to provide appropriate care for patients, all authorized professionals must not only have access, but also be required to enter immunizations administered. With a more comprehensive registry comes a more efficient delivery system, minimizing unnecessary vaccinations, as well as potential costs to both patients and providers when these instances of duplicative vaccinations occur. NYSIIS also serves as a quality improvement resource for providers, by allowing them to identify missed opportunities for vaccination and other issues that help improve individual clinical and administrative actions related to adult immunizations.

Health care providers serving adults may enter records into NYSIIS, but under the current discretionary language, uptake has been slow. The health care and public health benefits from vaccine registries in improving childhood vaccination rates cannot be understated. The legislation also allows for providers participating in Regional Health Information Organizations to have records submitted to NYSIIS through that mechanism, thus mitigating potential increases to workload and costs. Similarly, many other electronic health records can transmit information to the NYSIIS and CIR systems.

The roll-out of the COVID-19 vaccination highlights the value of immunization registries. Given that many people have received their vaccine at large clinics, entry of this data into NYSIIS and CIR is critical in tracking the state's progress, and in providing a way for providers to assure that their high-risk populations have been vaccinated. For the above stated reasons NYSACHO strongly supports this legislation as a means of leveraging available technology to improve public health protections against vaccine-preventable diseases, as well as individual patient care. We urge the legislature to enact this bill into law.

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