

January 16, 2014

To: Vaccines for Children (VFC) Providers

From: New York State Department of Health, Bureau of Immunization

Vaccines for Children Program Advisory
Regarding Separation of Public Vaccine Inventory

Recently, the Centers for Disease Control and Prevention (CDC) communicated with the New York State Department of Health (NYSDOH) about a need for increased accountability for publicly funded vaccine. The CDC would have required that VFC providers physically separate their public vaccine stock by funding source: VFC funded, other federally funded, and state funded vaccine, including State Children's Health Insurance Program (SCHIP) funded vaccine. The New York State (NYS) Vaccine Program recognizes how difficult this process would be for VFC providers and has worked with the CDC to implement a solution that would NOT require NYS VFC providers to separate different types of public vaccine stock. However, certain accountability procedures will need to be adhered to, so that CDC's requirements will be satisfied.

Currently, the New York State Department of Health (NYSDOH) requires that VFC providers physically separate public vaccine from private vaccine stock in their refrigerator and freezer storage units. This is affirmed annually when a provider signs the VFC Provider Agreement and is verified and reinforced at the time of VFC site visits. In addition, providers are required to submit an inventory report, which is reviewed as part of the order approval process.

In order for NYS VFC providers to be exempt from the new CDC guidelines requiring the separation of publicly funded vaccines, **providers must adhere to ALL of the following:**

1. Report ALL doses administered according to vaccine eligibility, within two weeks of administration, in the New York State Immunization Information System (NYSIIS).
2. Review and accurately update patient population data on current and all future VFC Provider Profiles. *Patient population must be consistent with reported doses administered in NYSIIS.*
3. Communicate any significant changes in patient population to the NYS VFC Program, as they occur, to ensure an accurate provider profile at all times.
4. Ensure that inventory reported with each order reflects current doses administered as reported in NYSIIS.

5. Provide the NYS VFC Program with accurate provider office contact information, including, an up-to-date e-mail and office phone number. Any changes to contact information should be communicated to the NYS VFC Program immediately.

Failure to satisfactorily complete any of the above steps could result in the need for a provider to separate public vaccine stock by funding source. Funding sources are currently identified on the vaccine invoice that arrives with all VFC vaccine shipments.

In accordance with the NYS Vaccine Program's agreement with the CDC, **the NYS VFC Program will implement the following:**

1. The NYS VFC staff will analyze vaccine eligibility data recorded in NYSIIS monthly to ensure eligibility information is consistent with that reported in the provider profile.
2. When eligibility information for doses ordered differs significantly from the doses administered reports, NYS VFC staff will contact a provider to discuss and address discrepancies.

Providers are required by Public Health Law to report all childhood immunizations to NYSIIS. Those not currently using NYSIIS to correctly report doses administered **MUST** complete appropriate training for all staff that report and order VFC and SCHIP vaccine. If upon completion of training, a provider is not fully compliant with NYSIIS requirements, the provider's VFC PIN will be held for noncompliance and providers will not be able to order public vaccine until full NYSIIS compliance is achieved. Providers will also be required to physically separate public vaccine stock by funding source for all existing inventory during the time period of completing all staff training and until full NYSIIS compliance is achieved.

The New York State Vaccine Program thanks you for your patience during the implementation of the changes requested by the CDC. Providers requiring assistance with using NYSIIS should call the NYSIIS helpdesk at 1-866-389-0371.