

New York State Academy of Family Physicians

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December 5, 2022

Hon. Kathy Hochul
Executive Chamber
New York State Capitol
Albany, NY 12224

Re: Request to Expand Vaccine Registry Reporting in SFY 2024 Executive Budget

Dear Governor Hochul:

The New York Academy of Family Physicians (NYSAFP), which represents approximately 6,000 physicians, residents, and students in family medicine across New York State respectfully urges your consideration for making improvements to New York's vaccine record keeping and infrastructure by requiring adult vaccine reporting to the State and New York City registries.

As background, NYSAFP has been supporting stand alone legislation (S75A, Hoylman/A279A, Gottfried) to accomplish this goal by requiring any health care provider who administers a vaccine to persons nineteen years of age or older to report the immunization to the New York State Immunization Information System (NYSIIS) or the New York City Citywide Immunization Registry (CIR) when applicable, unless the individual receiving the vaccine opts out.

Under current law, all immunizations administered to children less than nineteen years old must be entered into NYSIIS/CIR. Expanding this requirement to adult vaccinations will ensure that providers have a reliable record of immunization information from multiple providers for children and adults alike. Benefits of this expansion would include:

- Ensuring New York has a robust registry for all residents receiving immunizations so patients receive only the vaccines they need;
- Availability of reliable data for Departments of Health to use to target education efforts focused on addressing disparities and barriers in access to vaccine preventable diseases;
- Decreased time spent seeking immunization histories from other providers;
- Assistance in the management of vaccine supply and ordering; and
- The ability to immediately identify any impacted patients if there is a vaccine recall,

among others.

Now more than ever with the ongoing COVID-19 pandemic and other viral outbreaks and spikes, the need to track vaccine administration is more evident. We appreciate your recognition of the challenges that adult opt-in consent presents, which you waived in Executive Orders [21](#) for polio vaccine administration, [20](#) for mpox vaccine administration. Your actions build on previously issued Executive Order 202.82 to require the reporting of COVID-19 and flu vaccinations given to adults during the emergency declaration period to be reported to NYSIIS/CIR and allowing the reporting of other adult vaccines without special permission, similar to pediatric vaccinations. These public health measures should be made permanent to enable continued access by health providers to such adult vaccination records and continue reporting in perpetuity to ensure accurate and robust vaccine tracking.

Nationally, reporting to vaccine registries is considered a standard of care by the CDC for those receiving vaccines. New York State and New York City's registries are two of just a handful of registries which require opt in consent for adult vaccine reporting. Most do not require consent for adult vaccine reporting or have a patient opt out provision, as we are advocating. We believe moving from an "opt in" which we have now for adult vaccines to an "opt out" will result in the overwhelming majority of adult vaccines to be included as recommended to improve New York's vaccine record keeping and vaccine infrastructure.

With adults receiving vaccines from multiple providers (physician offices, clinics, hospitals, pharmacies and others), it is crucial that a universal record and reliable data be available for all health care providers and departments of health, similar to what is in place for the pediatric population.

NYSAFP urges you to include this critical policy in your SFY 2024 Executive Budget to help ensure that all New Yorkers receive the recommended vaccines they need and further reduce the incidence of vaccine-preventable disease in the State.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Symons".

Andrew B. Symons, MD
President