

**AMERICAN CANCER SOCIETY CANCER ACTION NETWORK  
AMERICAN COLLEGE OF OBSTETRICIANS AND GYNECOLOGISTS DISTRICT II  
AMERICAN NURSES ASSOCIATION - NEW YORK  
COMMUNITY PHARMACY ASSOCIATION OF NEW YORK STATE  
HIGHMARK BLUECROSS BLUESHIELD OF WESTERN NEW YORK  
HIGHMARK BLUESHIELD OF NORTHEASTERN NEW YORK  
KIMBERLY COFFEY FOUNDATION  
MEDICAL SOCIETY OF THE STATE OF NEW YORK  
NAACP NEW YORK STATE CONFERENCE  
NEW YORK CHAPTER AMERICAN COLLEGE OF PHYSICIANS  
NEW YORK STATE ACADEMY OF FAMILY PHYSICIANS  
NEW YORK STATE ASSOCIATION OF COUNTY HEALTH OFFICIALS  
NEW YORK STATE COUNCIL OF HEALTH-SYSTEM PHARMACISTS  
NEW YORK STATE PUBLIC HEALTH ASSOCIATION  
PARKER JEWISH INSTITUTE FOR HEALTH CARE & REHABILITATION  
PHARMACISTS SOCIETY OF THE STATE OF NEW YORK**

**The above-listed organizations jointly support legislation S.75-A (Hoylman) / A.279-A (Gottfried) for universal vaccine reporting to the statewide and New York City vaccine registries.** In particular, it ensures that all health providers who administer a vaccine to persons nineteen years of age or older report the immunization to the New York State Immunization Information System (NYSIIS) or the New York Citywide Immunization Registry (CIR). This is how immunizations administered to children less than nineteen years old are required to be reported to NYSIIS/CIR, since 2008. **Expanding this requirement to adult vaccinations will ensure an accurate, reliable record of immunization information from multiple providers for adults, unless an adult receiving a vaccine opts out.**

Immunization registries offer numerous benefits:

- Providing up-to-date and accurate vaccine histories for individuals to help maintain vaccine records and prevent over-immunization.
- Providing health providers with consolidated and accurate immunization records of their patients, and support with an increasingly complex vaccination schedule. Providers also use registries to manage their vaccine inventory.
- Providing State and local Health Departments with the tools and information to help control vaccine-preventable diseases through accurate vaccine tracking, as we are seeing currently with the COVID-19 pandemic. Registries are also important to monitor vaccines if recalled as defective or having been tampered with since vaccines given to individuals are tracked down to lot numbers making it easy to contact an impacted individual.

Importantly, NYSIIS and CIR are not publically available databases and cannot be accessed through an Internet search. They are secure, protected vaccine tracking systems within the Health Commerce System and access is granted only to certain authorized users including a patient's own health provider, other vaccine providers, and limited others for medical, vaccine tracking and reporting, and other public health purposes. It is critical for all vaccine providers giving immunizations to adults to universally report to these registries.

Further, as an adult is choosing to receive a vaccine, a report to the registry should naturally follow as it does for children. This is the only way to ensure that individuals receive *only the vaccines they need, and are not unnecessarily over-vaccinated*, if they lack a durable record to track not only annual vaccinations like influenza, but also those that one might only get episodically, once per decade or even once per lifetime. This is especially true for younger adults who may not routinely visit a primary care provider as well as seniors who may be offered vaccines for shingles or pneumococcal by multiple vaccine providers including hospitals, pharmacies and their clinicians.

We now have a generation of data for children's vaccines for the period of 2008 -2021 who have become adults, which will be squandered if vaccinations received by these patients as adults are not seamlessly entered into the registry. And now more than ever in the midst of the COVID-19 pandemic, the need to track vaccine administration through a robust vaccine registry is evident. In response, an Executive Order (202.82) was issued to require the reporting of COVID-19 and flu vaccinations given to adults during the emergency declaration period to be reported to NYSIIS or CIR, and allowing all adult vaccines to be reported without special permission. This public health measure should be made permanent to enable continued access by health providers to such adult vaccination records and continue reporting in perpetuity for accurate and robust vaccine tracking.

With adults receiving vaccines from multiple providers (physician offices, clinics, pharmacies, hospitals, local health departments 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. **We urge the prompt passage of this legislation to ensure that New Yorkers receive only the recommended vaccines they need as we continue to work to address disparities in vaccine access and reduce the incidence of vaccine-preventable disease in the State.**