

American Nurses Association - NY  
American Society for Meningitis Prevention  
Global Healthy Living Foundation  
Hispanic Federation  
J.A.M.I.E Group  
Kimberly Coffey Foundation  
Medical Society of the State of New York  
New York Chapter American College of Physicians Services  
New York State Academy of Family Physicians  
New York State Association of County Health Officials  
New York State Association of Health Care Providers  
New York State Public Health Association  
New York State Radiological Society

November 25, 2025

The Honorable Kathy Hochul  
Governor of New York State  
NYS State Capitol Building  
Albany, NY 12224

**Re: Please Prioritize Immunization Access and Investment in the FY 2026-27 State Executive Budget**

Dear Governor Hochul:

The above-listed organizations, which includes members of the *Let's Get Immunized NY* campaign, started nearly five years ago, are strongly committed to reducing vaccine-preventable illness, improving access, and supporting investment in our state's immunization infrastructure. We thank you for your leadership in ensuring that New Yorkers have access to lifesaving vaccines and respectfully request your support for several vaccine-related priorities in the FY 2026-27 State Executive Budget.

The COVID-19 pandemic underscored the profound impact that immunization has in preventing severe disease, hospitalization, and death. Despite this and strong medical consensus on the safety and effectiveness of vaccines, disinformation about vaccines persists and as you know, vaccine confidence and access are being systematically undermined by the current federal administration. Some states have disturbingly begun plans to phase out childhood vaccination mandates, and diseases like measles, once believed to be eliminated in the United States, have not only returned in New York but hit record numbers across the U.S. Further, several recent changes to the Advisory Committee on Immunization Practices (ACIP) have weakened the panel and caused issues with the rollout of COVID-19 vaccines. These serious threats to our public health present a critical need to invest in immunization access and infrastructure. We respectfully request inclusion of the following priorities and investments in the FY 2026-27 State Executive Budget.

**1. Update statutory references to ACIP and allow for an alternative role for the Department of Health to determine vaccine approvals/ requirements.** We commend your swift action this fall to ensure unhindered access to COVID-19 vaccines through Executive Order 52. However, there are several provisions in existing statute which rely on ACIP for vaccine guidance. Given this, we recommend that you include language in your Executive Budget to authorize the New York State (NYS) Department of Health to make recommendations for the administration of and payment for vaccines. We support S.8496-A, Hinchey/ A.9060-A, Paulin which would recognize evidence-based vaccine guidance from organizations including the NYS Immunization Advisory Council (IAC), the 21st Century Workgroup for Disease Elimination and Reduction (WDER), or any interstate body formed in order to review immunizations, in addition to recommendations by ACIP. This would ensure state-regulated insurance coverage for any vaccines recommended by these committees

**2. Improve vaccine recordkeeping and public health surveillance by including language in your Executive Budget to require reporting of all vaccinations given to individuals ages 19 years of age or older to the NYS or NYC vaccine registries (NYSIIS/CIR),** moving from an “opt-in” to an opt-out consent provision for reporting in New York (as provided in S453-A, Hoylman-Sigal/ A765, McDonald). New York is one of only a handful of states or cities that require “opt-in” consent for adults to have their vaccines entered in the immunization registries. Robust immunization registries have numerous benefits as is evident with pediatric vaccines in New York which have been required to be reported to NYSIIS/CIR for nearly two decades. They ensure that health care providers have consolidated and accurate immunization records of their patients, prevent unnecessary, over-immunization, and provide State and local Health Departments with the tools and information to help control vaccine-preventable diseases through accurate vaccine tracking and identification of gaps/disparities. A [study](#) of the Texas opt-in consent system found that opt-in systems are more expensive to operate than opt-out systems. Moving New York to an opt-out consent provision could streamline the process and redirect critically needed healthcare funding to other vaccine-related priorities.

Accurate vaccine record-keeping is more crucial than ever to contain vaccine-preventable diseases and safeguard against another pandemic. As previously noted, in NYS, all immunizations administered to children less than nineteen years old have been required to be reported to NYSIIS/CIR since 2008. These registries also allow immediate notification of patients and providers if a product recall is required.

**3. Increase New York’s Fee-For-Service (FFS) Medicaid payment rate for all immunization providers** to improve vaccination rates. Currently, New York reimburses

New York State (NYS) FFS healthcare providers administering a vaccine to an adult at a rate of \$13.36, much lower than Medicare Part B's New York City reimbursement rate of \$37, for example. Increasing Medicaid rates to be more on par with Medicare would positively impact vaccine rates for the adult Medicaid FFS population as a [2024 IQVIA Institute for Human Data Science](#) study found that a \$1 increase in vaccine reimbursement payment is associated with a 0.43 percentage point increase in the state vaccine coverage rate (VCR).

Further, it is critical to compare this rate to other state's Medicaid programs. [Avalere](#) recently assessed Medicaid adult vaccine provider reimbursement rates across all 50 states and found that **a number of state Medicaid programs reimburse at a higher rate than New York, including Massachusetts, Vermont, and California.** Increasing New York's FFS payment rate for vaccine administration would benefit public health as a whole given providers may be disincentivized to order, stock, and administer vaccines if costs are not adequately reimbursed. This limits vaccine access for Medicaid beneficiaries. Increasing administration rates would also compensate providers for the additional time necessary to counsel patients on the many benefits of getting vaccinated. It would also allow clinicians to spend more time with vaccine hesitant individuals. The goal is to improve New York's low vaccination rates (as of 2024) which for adults for pneumococcal infections is 64% (national average being 70%), shingles is 27% (national average being 32%), and tetanus at 65% (national average being 70%).

**4. Support for additional state resources dedicated to a sustained vaccine promotion and education public relations campaign** focused on the importance of vaccination for all New Yorkers and combatting increasing disinformation efforts. We laud several initiatives in the past years, including DOH's 2024 COVID-19 & Flu Vaccine Campaign that helped to bolster confidence and understanding of vaccines, the establishment of the Division of Vaccine Excellence to ensure the State develops a strategic framework for vaccination, and New York's leadership in the new Northeast Public Health Collaboration. We strongly support these measures and recommend sustaining and expanding state resources in the next budget to preserve public health functions and encourage New Yorkers to receive all recommended vaccines throughout the year.

Investing in strong immunization infrastructure that bolsters access and uptake of vaccines is an investment in New York's public health overall and reduces more costly care due to disease development, hospitalizations and other treatment. Collectively, we seek to preserve the strong immunization policies and programs in New York State and further strengthen vaccine access and utilization for all. We appreciate your consideration of these priorities and urge their inclusion in your FY 2026-27 State Executive Budget.

Thank you for your consideration of these important public health recommendations. If you have any questions or would like further information, please contact Vito Grasso, EVP at NYS Academy of Family Physicians at [vito@nysafp.org](mailto:vito@nysafp.org).

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