



STATE OF NEW YORK DEPARTMENT OF HEALTH

Corning Tower The Governor Nelson A. Rockefeller Empire State Plaza Albany, New York 12237

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November 2, 2007

George Dunkel
American Academy of Pediatrics
Executive Director
One Executive Centre Drive
Suite 201, Corporate Plaza
Albany, New York 12203

Dear Mr. Dunkel:

The purpose of this letter is to share information with you regarding the development and implementation of the New York State Immunization Information System (NYSIIS), the New York State Department of Health's (NYSDOH) statewide electronic immunization registry. Article 21, Title 6, Section 2168 of the Public Health Law (PHL) requires health care providers to report all immunizations administered to persons less than 19 years of age to the statewide registry beginning on January 1, 2008. The law also requires that immunization histories of all persons less than 19 years of age who receive vaccines be recorded in the registry. Several important issues related to NYSIIS implementation are discussed here, including:

- Interpretation of the statutory language;
- Training opportunities for providers and their staff;
- Accessing NYSIIS; and
- Timing of reporting requirements.

Background

Immunization registries, also known as Immunization Information Systems (IISs), play a significant role in improving public health. Currently, there are IISs operating in 46 states. Registries directly benefit health care providers, families and public health agencies. Providers realize many benefits from IISs, such as a reduction in paperwork, staff time, and costs associated with immunization related activities. The American Academy of Pediatrics has published a policy document that summarizes the benefits and cost saving measures that an IIS can bring to a provider practice (*Pediatrics*, Immunization Information Systems. 2006; 118; 1293-1295). Records from multiple providers where a patient has received immunizations can be consolidated into one reliable record. The registry can be used to generate reminders for individual patients, to manage complicated immunization schedules and to generate official immunization records to document compliance with school, camp, or day care entry requirements. Registries assist children and families by assuring that an authoritative record of immunization is readily available that will assure that the child is up to date and avoids unnecessary re-immunization for school entry. Finally, registries benefit public health by assuring timely access to population immunization levels to better target public health efforts.

Immunization Information Systems have been in use in New York State for many years. Two state-funded, voluntary regional registry projects, HealthyShot and the Immunization Registry and Information Source (IRIS), have existed since the mid-1990's and, since 2001, have been collectively referred to as the New York State Immunization Information System (NYSIIS). The new statewide, mandatory web-based registry will continue to use the name NYSIIS. In addition, the Citywide Immunization Registry (CIR) has been

operational in New York City since 1997 and providers practicing in New York City are required to report to the CIR. The CIR and NYSIIS will continue to operate independently, but records will be shared between the two registries.

Interpretation of the Statutory Language

Section 2168 of the PHL, which authorized the statewide registry, provides the necessary legal authority to implement the statewide, mandatory registry. Regulations will be promulgated but are unlikely to be formally adopted by January 1, 2008. The draft regulations, which will be shared with stakeholders shortly, will provide clear guidance of how the Department intends to proceed with the implementation of registry requirements.

The statute allows for the “orderly implementation and operation of the registry.” This language was put in the law specifically to give NYSDOH flexibility in implementing the law. As part of this orderly implementation, our focus for the first year of implementation will be extensive outreach to and training of providers and other users on establishing accounts on the new system and successfully submitting data.

Obviously, implementing a statewide electronic system in every provider office is a large undertaking. It is the Department’s intention to rely mainly on technical assistance and other supports to get physicians on the system and address those who are having difficulties using the new application. Although the law provides for penalties for providers who do not participate in the universal reporting requirements, citations and fines are not expected to be needed to ensure full NYSIIS implementation. NYSDOH does not intend to utilize penalties for failure to report until after a full year of implementation (January 1, 2009).

Training Opportunities

The NYSDOH will implement a phased-in approach to train new users and transition existing users to the web-based application. Free training will be available in several formats: classroom, webinar, on line tutorial, and a user manual. Formal interactive training in both classroom settings and webinars will be delivered statewide in a regional approach between January and July 2008. Exact dates and locations are being finalized. Invitations and the detailed training schedule will be mailed in November to all providers who participate in the Vaccines for Children (VFC) program. Other providers will be able to access the training schedule through their medical professional societies, the Health Provider Network (HPN), or the public website of the NYSDOH. The training schedule will follow the time frame specified below.

NYSIIS Training Schedule

Jan 15 – Feb 15. Upper Hudson: Greene, Columbia, Rensselaer, Albany, Schenectady, Montgomery, Fulton, Saratoga, Washington, Warren, Hamilton, Essex, Clinton, Franklin
Feb 15 – Mar 15. Central NY: Herkimer, St. Lawrence, Jefferson, Lewis, Oneida, Oswego, Cayuga, Onondaga, Madison, Chenango, Cortland, Tompkins, Tioga, Broome
Mar 15 – Apr 15. Finger Lakes: Chemung, Schuyler, Seneca, Wayne, Monroe, Orleans, Wyoming, Livingston, Ontario, Yates, Steuben
Apr 15 – May 15. Western: Niagara, Erie, Chautauqua, Cattaraugus, Allegany, Genesee
May 15 – Jun 15. Lower Hudson: Westchester, Rockland, Putnam, Orange, Dutchess, Ulster, Sullivan, Delaware, Otsego, Schoharie
Jun 15 – July 15. Long Island: Nassau, Suffolk

Non-interactive independent learning opportunities such as on-line tutorials and system manuals will also be available. Providers can begin to report anytime after January 1, 2008.

Access to NYSIIS

Access to the statewide, web-based system will be available through the Health Provider Network (HPN) on the NYSDOH Health Commerce System. All NYSIIS users will be required to have an individual HPN account. Most physicians should have an HPN account now to access their Physician Profile or to order state-mandated prescription forms, although they may need to update their passwords. Medical professionals can receive an account and may designate other users, both medical and non-medical staff, to enter records. Providers are encouraged to initiate the process to obtain an HPN account as soon as possible.

Timing of Reporting Requirements

The target implementation date for providers to begin actively reporting to NYSIIS will be approximately one month after interactive training has been offered in their particular region. Providers are strongly encouraged to begin reporting after training has concluded in their particular region because, although the initial start date for reporting can be delayed, all immunizations administered after January 1, 2008 to children less than 19 years of age, including immunization histories, will still be required to be reported eventually into the system. The statute requires the entry of data to occur within 14 days of vaccination but the NYSDOH recognizes that during the first year of implementation this might pose a significant challenge to health care providers. As previously indicated, providers will not be cited or fined for failure to report until after January 1, 2009.

I hope that the information in this letter is informative to you. Please promote the new NYSIIS application to your membership. Your support of New York's new web-based application and participation throughout the implementation period is invaluable to the project's success. For more details on the new legislation and NYSIIS, please review the enclosed list of frequently asked questions (FAQs) or visit the Immunization Program website on the HPN at <https://commerce.health.state.ny.us/hpn/bcdc/immunization/nysiis.html>. Please contact NYSIIS staff at the NYSDOH Immunization Program at (518) 473-4437 or nysiis@health.state.ny.us with questions or requests for presentations.

We are very appreciative of our partnership with the American Academy of Pediatrics as we implement this important public health initiative. Please continue to bring any issues to our attention as we move forward.

Sincerely,



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Director, Center for Community Health

Enclosure