

Topic: Reporting Administered Doses

Request Date: April 25, 2017

Information Requested: Virginia's VFC Program (VVFC) and the Virginia IIS (VIIS) implemented a policy that requires Virginia's VFC providers to report administered immunizations to the state's immunization registry. A handful of VFC providers are refusing to report as required. Virginia is seeking information from other awardees that have an IIS reporting requirement for providers. What actions, if any, are taken in your state when a provider refuses (or cannot) report to your IIS?

Requesting Member: Richard Bradley (VA)

Responding Member(s): Rashid Malik (MD), Amy Metroka (NYC), Verónica Rodríguez (Puerto Rico), Aras Islam (Philadelphia), Freddie Barber (AR), Kim Salisbury-Keith (RI), Kevin Samuelson (WI), Denise Wilson (GA), and Via Fuata (American Samoa),

Results:

MD: In Maryland, we have a mandate in place and all VFC providers are required to report to MDIIS (ImmuNet) either electronically or manually directly into our IIS. We have spent a good portion of 2016 for provider outreach to make them aware of our reporting requirements in 2017. We have also made them aware that a non-compliance will suspend them from VFC program either temporarily or permanently until all requirements are met. We are actively working with VFC providers and getting them connected with ImmuNet and most of them are already reporting to us. Starting May 1, 2017, we will start suspending providers that are still not reporting via any of the methods mentioned above until they start reporting.

NYC: In NYC, we link VFC vaccine distribution to IIS reporting. The provider must report VFC vaccine administration to the IIS to have their VFC orders approved in full. Attached is a paper explaining how we implemented this policy back in 2006.

PR: Puerto Rico's VFC contract includes the requirement that administered vaccines of federal funds must be reported in the IIS in order for providers to continue to receive vaccines. If the provider doesn't report, they don't receive more vaccines until all information is entered in the IIS.

Phila: In Philadelphia, we have a reporting requirement as well. Our IIS team works with the Philadelphia VFC team to withhold VFC vaccine orders for sites that do not fulfill the reporting requirement. We essentially suspend them from ordering until we are able to capture the data and any missing back-data. We advocate on the need for receiving the data in the IIS because it is really the only way we can accurately account for the VFC doses being administered.

AR: As the VFC Coordinator, I give them time to comply (30 days) and then threaten to withhold their vaccine. We also put the VFC providers ahead in the HL7 interface testing line. If they are actively testing, we give them some slack. We can fine them \$25 per immunization (but never have). Sometimes we can't do anything politically.

RI: RI is a universal vaccine state that includes requirements for reporting in our state supplied vaccine agreement (separate from VFC Agreement). By signing the agreement – the provider has agreed to these terms. If a provider is non-compliant we begin with reminders. If non-reporting persists we imply that their ability to continuing receiving state vaccine is in violation of the agreement and continued non-compliance could impact future ordering. Prior to this type of communication, we work with the provider to remove any barriers to reporting – and will accept paper reporting if there are issues that are unresolved with their electronic health record vendor.

WI: Wisconsin sent notices to non-reporting providers and after a few weeks, sent another reminder explaining that they would be suspended from VFC if they continued to not submit data.

Most providers have complied with the policy. Only a handful have been suspended.

GA: In Georgia, our VFC providers are prevented from ordering state supplied vaccines if they are not in compliance for reporting vaccinations and if their monthly reports are not in compliance.

AS: I think that on the VFC Provider Agreement, part of receiving VFC funded vaccines as a requirement is for them to do data entry in the IIS. I thought I saw that in there.