

# Current Immunization Information Systems Policy Landscape Assessment

May 5, 2023

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# Presentation Overview

- Understanding the complex policy landscape
- Background information
- The current landscape
- Changes since the last landscape assessment
- Next steps

# Understanding the Complex Landscape

- Complete and accurate vaccination administration data is critical to monitoring vaccination coverage estimates, etc.
- Jurisdiction-specific policies may limit collection of vaccination surveillance data
- Jurisdiction-specific policies impact the availability of vaccination data to local jurisdictional IIS and state/federal governments

# Legal Definitions

## Laws

Laws describe the principles and regulations established in a community by some authority and applicable to its people, whether in the form of legislation (statutory law) or of custom and policies recognized and enforced by judicial decision (case law).

## Administrative Rules

Administrative rules (sometimes called *regulations*) are officially promulgated agency regulations that have the force and effect of law. Generally these rules elaborate the requirements of a statute.

## Operational Policies

Policies provide operational guidance in the absence of laws and.

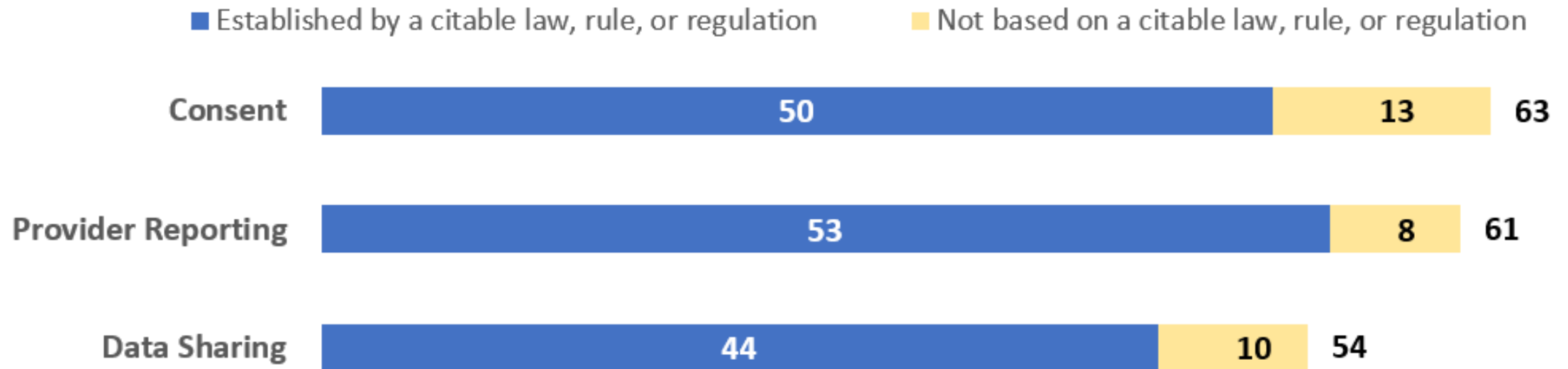
# Terms Used in the Landscape Assessment

- **Mandate** – determined by law, regulation or rule
- **Operational Policy** – established within a program or health department when governance is not established through law, regulation or rule

# Policy Types Impacting IIS Data

- Individual Consent
- Provider Reporting
- Data Sharing

# The Current Landscape Assessment



# Consent Policies

Consent is whether or not an individual has the right to decide if their demographic and immunization data is included in the IIS

Types:

- Mandatory inclusion, meaning that an individual is included in the IIS with no possibility to opt out
- Implicit consent, meaning that an individual is included in the IIS unless they choose to opt out
- Explicit consent, meaning that an individual must give consent, or opt in, to be included in the IIS

# 63 Known Consent Policies for Children

## Child Vaccine Recipients

<b>14</b>	Include vaccine recipients in the IIS with no possibility for their parent(s)/guardians to opt them out
<b>43</b>	Include vaccine recipients in the IIS unless their parent(s)/guardian(s) opt them out
<b>6</b>	Must obtain explicit consent from vaccine recipients' parent(s)/guardian(s) to participate in the IIS

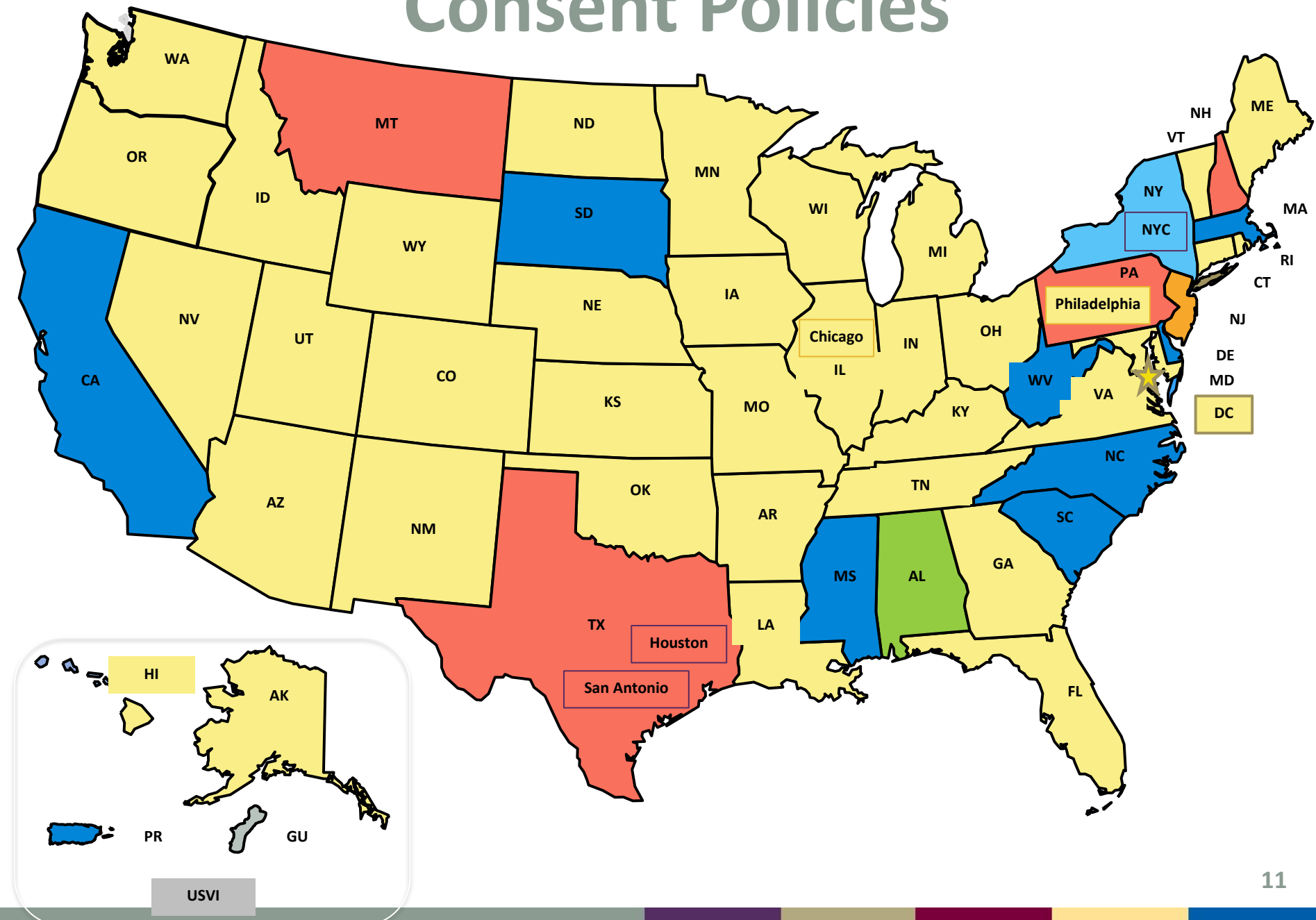
# 63 Known Consent Policies for Adults

Adult Vaccine Recipients	
<b>12</b>	Include vaccine recipients in the IIS with no possibility for them to opt out
<b>42</b>	Include vaccine recipients in the IIS unless they choose to opt out
<b>9</b>	Must obtain explicit consent from vaccine recipients to participate in the IIS

**Legend**

Mandatory inclusion for all individuals in the IIS 11
Mandatory inclusion for children; explicit consent for adults 2
Mandatory Inclusion for specific vaccine recipients 1
Implicit consent for all individuals 42
Implicit consent for children; explicit consent for adults 1
Explicit consent for all individuals 6
Policy developed and under legal review 2

# Consent Policies



Palau	American Samoa
North Mariana Islands	Marshall Islands
	Micronesia

# Reporting Policies

Requirements for vaccination providers to report immunizations to the jurisdiction's IIS

Types:

- All providers are mandated to report to the IIS
- Specific providers are mandated to report to the IIS
- Mandatory with age requirements
- Specific vaccines are mandated to report to the IIS
- No mandatory reporting to the IIS

Note: Jurisdictions may have a combination of reporting policy types

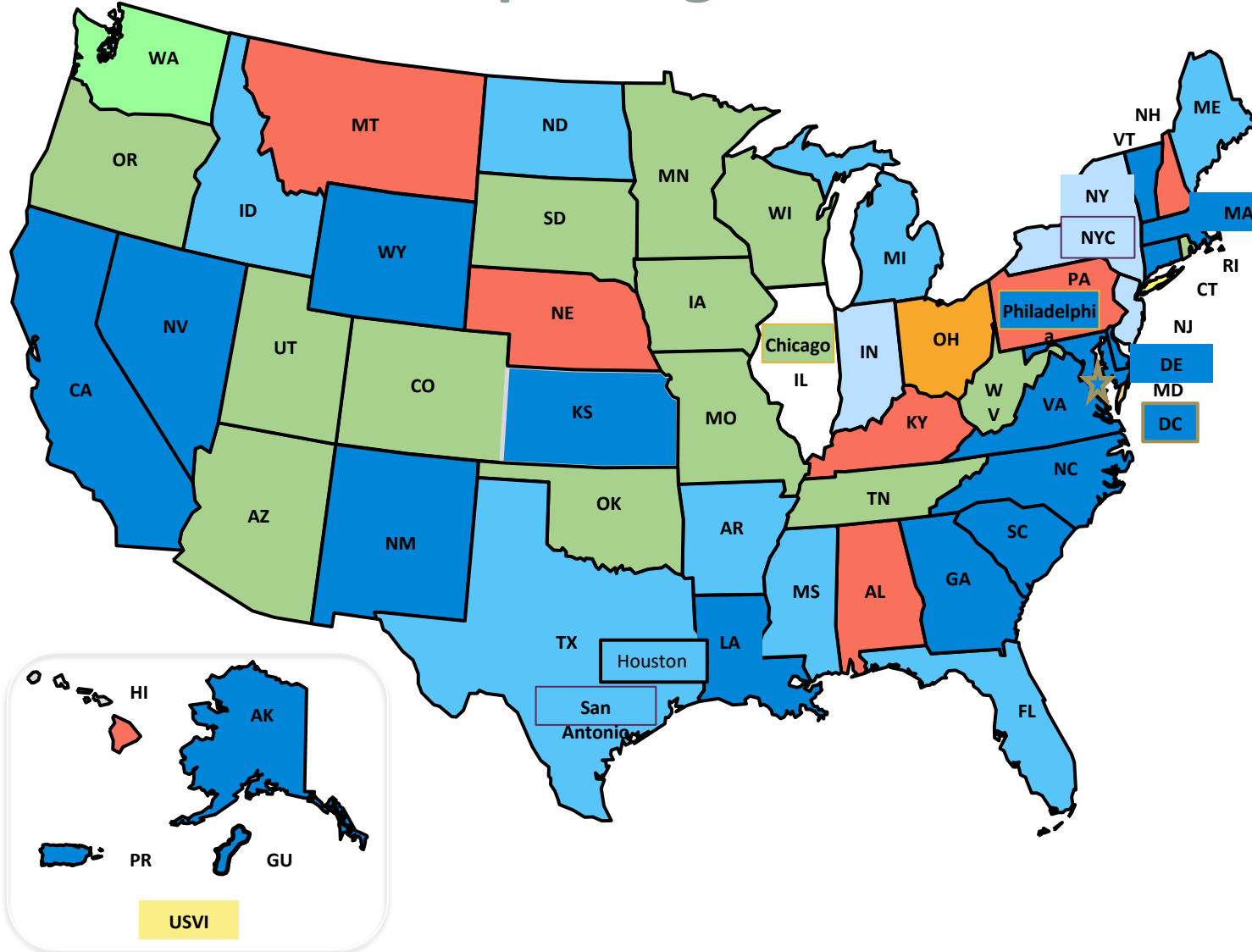
# 61 Known Reporting Policies

## Reporting Requirements<sup>†</sup>

<b>20</b>	Mandate by law that all providers must report immunizations for all vaccine recipients
<b>16</b>	Mandate reporting of immunizations for only a subset of vaccine recipients (e.g., children age 18 or younger)
<b>15</b>	Mandate reporting of immunizations by only certain providers (e.g., pharmacists, registered nurses)
<b>10</b>	Mandate reporting of only specific immunizations (e.g., COVID-19, VFC vaccines)
<b>4</b>	Mandate reporting of immunizations only under specific circumstances (e.g., a declared disaster)
<b>3</b>	Require by operational policy that all providers report immunizations for all vaccine recipients
<b>7</b>	Do not mandate reporting by providers

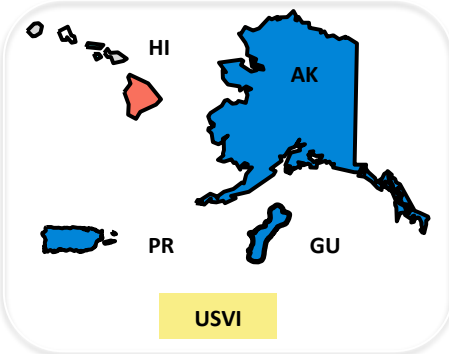
<sup>†</sup> An individual jurisdiction may be represented in more than one category.

# IIS Reporting Policies



Legend
Mandated reporting for all providers 20
Mandated reporting for specific ages 11
Mandated reporting for specific providers and specific ages 4
Mandated reporting for specific providers 15
Mandated reporting of specific vaccines 1
Required to report through an operational policy 3
Not required to report through an operational policy 1
No mandated reporting to the IIS 7

- Palau
- American Samoa
- North Mariana Islands
- Marshall Islands
- Micronesia



# 54 Known Data Sharing Policies

## Data Sharing Policies<sup>††</sup>

<b>21</b>	Require a data use/sharing agreement or memorandum of understanding
<b>14</b>	May share data upon request or with approval/authorization
<b>15</b>	Require that data are only used for public health or other specific purposes (e.g., disease surveillance, IIS management)
<b>15</b>	Require protecting the data's confidentiality
<b>7</b>	May only share deidentified data or nonidentifying summary statistics
<b>3</b>	Allow vaccine recipients to request to limit sharing of their data that are stored in the IIS
<b>2</b>	May only share data during a declared state of emergency
<b>1</b>	Has no specific data sharing requirements or restrictions
<b>3</b>	Have not yet established data sharing policies

<sup>††</sup> An individual jurisdiction may be represented in more than one category.



# Policy Changes Since the 2015 Landscape Assessment

## Consent

- 12 jurisdiction changed the consent policy applying to all constituents
- 2 jurisdictions changed their childhood consent policy
- 4 jurisdictions changes their adult consent policy

## Reporting

- 10 jurisdictions established universal reporting mandates
- 22 jurisdictions added some type of reporting mandate (e.g. for an age group or specific providers)

## Next Steps

- 1) Understand your jurisdiction's policies for consent and reporting to determine their specific impact on data in the IIS
- 2) Understand your jurisdiction's data sharing policies to determine their impact on the availability of the data for public health purposes
- 3) Determine an enforcement approach if your jurisdiction has a reporting mandate but low reporting
  - Talk with a jurisdiction that has no mandate but has high reporting

# Acknowledgements

## IIS SMEs

- Jan Hicks-Thomson
- Paul Klintworth
- Michelle Ruslavage
- Bobbie Strickland

## BeVera Team

- Kris Phillips
- Jane Welch

# Questions



The findings and conclusions in this report are those of the authors and do not necessarily represent the official position of the Centers for Disease Control and Prevention.