



Dutchess County Department of Health Public Health Advisory*

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Michael C. Caldwell, MD, MPH
Commissioner of Health



William R. Steinhaus
County Executive

NYSDOH LETTER TO CERTIFIED PHARMACIST IMMUNIZERS

Date: February 22, 2011 2:00 pm

Please Distribute to: Pharmacies, Pharmacists, and Certified Pharmacist Immunizers.

SUMMARY:

- New York State Department of Health issued a letter on 02/16/2011 reminding all pharmacies employing NYS certified pharmacist immunizers of their responsibility to report information about seasonal influenza and pneumococcal vaccinations they administered.
- Pharmacies have the option of either requiring their pharmacist immunizers to report on their own behalf, or by appointing a pharmacy representative to report on behalf of their pharmacists, by excerpting data from NYSIIS or other records the pharmacy maintains.
- For additional information or questions for those located outside of NYC, call the NYSDOH Bureau of Immunization at 518-473-4437.

The February 16th letter from New York State Department of Health reminds pharmacies of the two amendments to the New York State Education Law went into effect on December 3, 2008, allowing pharmacists to immunize those 18 years of age and older against influenza and pneumococcal diseases (Chapter 563 of the Laws of 2008).

Pharmacist immunizers are subject to two reporting requirements: Certified Pharmacist Immunizer Survey and the NYS Immunization Information System (NYSIIS). Detailed instructions were also provided regarding the information to be reported.

A Health Commerce System (HCS) account is needed for the completion of the online Certified Pharmacist Immunizer Survey, an account may be obtained at <https://hcsteamwork1.health.state.ny.us/pub/top.html>.

A copy of the full document may also be found on the Dutchess County Department of Health's website at dutchessny.gov in the healthcare provider's section.

***Health Alert**- conveys the highest level of importance; warrants immediate action or attention; **Health Advisory**- provides important information for a specific incident or situation; may not require immediate action; **Health Update**- provides updated information regarding an incident or situation; unlikely to require immediate action.

Dutchess County Department of Health

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www.health.ny.gov

Nirav R. Shah, M.D., M.P.H.
Commissioner

James W. Clyne, Jr.
Executive Deputy Commissioner

February 16, 2011

Dear Pharmacy Director:

The purpose of this letter is to remind all pharmacies employing New York State certified pharmacist immunizers of their responsibility to report information about seasonal influenza and pneumococcal vaccinations they administer to the New York State Department of Health (NYSDOH). An annual survey for reporting purposes (*Certified Pharmacist Immunizer Survey*) will be available via the NYSDOH's Health Commerce System (HCS) on July, 1, 2011, and data to populate this survey should span from 6/30/10 – 7/01/11. Please see the additional attached document, "How to Obtain an HCS Account" for more information on how to obtain your HCS account if you do not currently have one.

Requirements for Reporting of Immunizations Administered

On December 3, 2008 two amendments to the New York State Education Law went into effect, allowing pharmacists to immunize those 18 years of age and older against influenza and pneumococcal diseases (Chapter 563 of the Laws of 2008). Pharmacist immunizers are also subject to two reporting requirements.

1) The Certified Pharmacist Immunizer Survey (General Vaccine Administration Reporting for those 18 years and older):

Education Law § 6801 requires that all pharmacists who administer vaccines report the administration, absent any individually identifiable information, to the NYSDOH in a manner required by the Commissioner of Health. For more information see Education Law § 6801:

[http://public.leginfo.state.ny.us/LAWSSEAF.cgi?QUERYTYPE=LAWS+&QUERYDATA=\\$\\$EDN6801\\$\\$@TXEDN06801+&LIST=SEA2+&BROWSER=EXPLORE+&TOKEN=14509903+&TARGET=VIEW](http://public.leginfo.state.ny.us/LAWSSEAF.cgi?QUERYTYPE=LAWS+&QUERYDATA=$$EDN6801$$@TXEDN06801+&LIST=SEA2+&BROWSER=EXPLORE+&TOKEN=14509903+&TARGET=VIEW)

2) Registry Reporting for those 18 years and younger:

a) Pharmacist immunizers located outside of New York City (NYC) must report into the New York State Immunization Information System (NYSIIS).

For more information see New York State Public Health Law § 2168:

[http://public.leginfo.state.ny.us/LAWSSEAF.cgi?QUERYTYPE=LAWS+&QUERYDATA=\\$\\$PBH2168\\$\\$@TXPBH02168+&LIST=SEA2+&BROWSER=EXPLORER+&TOKEN=14509903+&TARGET=VIEW](http://public.leginfo.state.ny.us/LAWSSEAF.cgi?QUERYTYPE=LAWS+&QUERYDATA=$$PBH2168$$@TXPBH02168+&LIST=SEA2+&BROWSER=EXPLORER+&TOKEN=14509903+&TARGET=VIEW).

- b) Pharmacist immunizers located in NYC must report into the New York City Department of Health and Mental Hygiene's (NYCDOHMH) City Immunization Registry (CIR):

For more information, see Health code §11.07:

<http://www.nyc.gov/html/doh/downloads/pdf/cir/healthcode2005.pdf>

Therefore, to fulfill these requirements for immunizations given to 18 year old persons, pharmacist immunizers outside of NYC must report into both NYSIIS and the *Certified Pharmacist Immunizer Survey*; similarly, pharmacist immunizers in NYC immunizing persons 18 years old must report into both the New York City Immunization Registry (CIR) of the New York City Department of the NYCDOHMH and the *Certified Pharmacist Immunizer Survey*.

According to **current** regulations, *patient level data* that must be recorded by each pharmacist immunizer includes:

1. Recipient's name
2. Date of vaccine administration
3. Address at which vaccine was administered
4. Administering pharmacist
5. Immunizing agent
6. Manufacturer and lot number of immunizing agent

In addition, for the 2010-2011 reporting season, the NYSDOH is requiring the following aggregated information to be reported in the annual survey on an individual pharmacist level:

1. Total number of seasonal influenza vaccine doses administered
2. Total number of pneumococcal vaccine doses administered
3. An estimate of the number of persons vaccinated against seasonal influenza and pneumococcal disease by age according to the following categories:
 - a. 18 years old
 - b. 19-64 years of age
 - c. 65 years of age and older
4. Type of facility at which vaccination was given (e.g. pharmacy, POD, etc...)
5. County(-ies) in which immunizing agents were given
6. Type of individual(s) who signed your standing order (e.g. local physician, county health commissioner, etc...)

Pharmacists will also be asked to report the following personal information:

1. Certified pharmacist license number
2. Date on which immunizer certification was obtained

Pharmacies have the option of either requiring their pharmacist immunizers to report on their own behalf, or appointing one or more pharmacy representatives to report on behalf of their pharmacists, by excerpting data from NYSIIS, CIR, or other records the pharmacy maintains.

For additional information or questions for those located outside of NYC, call the NYSDOH Bureau of Immunization at 518-473-4437 or in NYC, call the NYCDOHMH Bureau of Immunization at 212-676-2323.

Sincerely,

A handwritten signature in black ink, appearing to read "Debra Blog MD". The signature is cursive and somewhat stylized.

Debra Blog, M.D., M.P.H.
Director
Bureau of Immunization

How to Obtain an HCS Account

An HCS account is needed for the completion of the online *Certified Pharmacist Immunizer Survey*. Many pharmacies already have HCS accounts. The person who has already obtained or who obtains this account is known as the HCS Director. This is generally someone with the authority to make decisions about personnel hiring and termination. If your pharmacy does not yet have an HCS account, you can obtain one here:

<https://hcsteamwork1.health.state.ny.us/pub/top.html>.

1) Pharmacies can either:

- report on behalf of their pharmacists, or
- instruct each employee to obtain their own HCS account so they may report on their own behalf

a) If a pharmacy chooses to report on behalf of their pharmacists, this reporting may be done by:

- The HCS Director, or the pharmacy can assign one or more other pharmacy staff into the role of HCS Coordinator(s), who then may report on behalf of the pharmacy's immunizing pharmacists.
- In either case, the HCS Director or the HCS Coordinator(s) will need to sign an agreement to abide by the policies and procedures for accessing and using data and information contained on the HCS.
- The HCS Director will then receive an email with the Document 1 Security and Use Policy (SAUP), the Document 2 SAUP, and the account request form (Document 1 - Schedule 2.A) that he/she must print out and sign in the presence of a notary.

b) If the pharmacy director chooses to have certified pharmacists report on their own behalf, pharmacists should be instructed to obtain their own HCS account. They will need to sign an agreement to abide by the policies and procedures for accessing and using data and information contained on the HCS.

- Pharmacists reporting on their own behalf can apply for an HCS account here:
<https://hcsteamwork1.health.state.ny.us/pub/top.html>
- The HCS Coordinator will receive an email with the Document 1 SAUP, the Document 2 SAUP, and the account request form (Document 1 - Schedule 2.B) that he/she must print out and sign in the presence of a notary.
- The Pharmacy HCS Director must also sign line six authorizing the HCS Coordinator's account, but the HCS Director's signature does not have to be notarized.

2) **Please mail both account request forms with original signatures in the same envelope to:**

NYSDOH
Commerce Accounts Management Unit (CAMU) Supervisors

North Pearl Street, Room 214

Albany, NY 12204-1899

HCS accounts will be created for the HCS Director and the HCS Coordinator. The HCS Director and HCS Coordinator applying for HCS accounts will each be mailed a letter containing an HCS PIN (needed to activate their account) and account activation instructions. The HCS Director form must be process with the HCS Coordinator's form.

Additional Resources:

- 1) For further information, please see NYSDOH's "Pharmacists as Immunizers" homepage: http://www.health.state.ny.us/prevention/immunization/providers/pharmacists_as_immunizers.htm.
- 2) For HCS Coordinator Training: Call 518-473-1809 or send an email to hcsoutreach@health.state.ny.us
- 3) To log into the HCS, please go to: <https://commerce.health.state.ny.us>

For additional information or questions for those located outside of NYC, call the NYSDOH Bureau of Immunization at 518-473-4437 or in NYC, call the NYCDOHMH Bureau of Immunization at 212-676-2323.