



The Maryland State Medical Society  
 1211 Cathedral Street  
 Baltimore, MD 21201-5516  
 410.539.0872  
 Fax: 410.547.0915  
 1.800.492.1056  
 www.medchi.org

# American Academy of Pediatrics

DEDICATED TO THE HEALTH OF ALL CHILDREN™  
 Maryland Chapter



## MID-ATLANTIC ASSOCIATION OF COMMUNITY HEALTH CENTERS

*Serving Maryland and Delaware*



TO: The Honorable Shane E. Pendergrass, Chair  
 Members, House Health and Government Operations Committee  
 The Honorable Ariana B. Kelly

FROM: Pamela Metz Kasemeyer  
 J. Steven Wise  
 Danna L. Kauffman  
 Richard A. Tabuteau

DATE: February 13, 2019

RE: **SUPPORT WITH AMENDMENT** – House Bill 316 – *Public Health – Vaccination Reporting Requirements – ImmuNet*

On behalf of the Maryland State Medical Society (MedChi), the Maryland Chapter of the American Academy of Pediatrics (MDAAP), and the Mid-Atlantic Association of Community Health Centers (MACHC), we submit this letter of **support** for House Bill 316, with a possible request for a clarifying amendment.

House Bill 316 proposes to strengthen the value and effectiveness of Maryland’s immunization registry, commonly referred to as ImmuNet, by mandating that health care practitioners report to ImmuNet all vaccines that are administered. ImmuNet has continued to improve as a mechanism for health care practitioners to determine whether their patients have received recommended and or required vaccinations. However, the database remains incomplete as not all practitioners and/or facilities have chosen to report the data to ImmuNet. House Bill 316 will ensure that health care practitioners have accurate and complete information when assessing what immunizations are indicated for their patients.

The above referenced organizations would however note that the language of subsection (D)(6) may require further clarification to ensure that if a vaccine is administered in an institution, such as a hospital, at the direction of a practitioner, that a designated individual or agent of the institution or facility may report the administered vaccine to ImmuNet on behalf of the practitioner. The language makes reference to an agent of the provider, but it is not clear if that would include the reporting associated with immunizations administered in a facility. Currently, much of the missing data in ImmuNet is associated with vaccines administered in health care facilities or pharmacies. With its noted request to evaluate the need for further clarification, MedChi, MDAAP, and MACHC strongly urge a favorable report.

**For more information call:**

Pamela Metz Kasemeyer  
 J. Steven Wise  
 Danna L. Kauffman  
 Richard A. Tabuteau  
 410-244-7000