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September 30, 2025

Department of Health  
PO Box 360  
Trenton, NJ 08625-0360

## **Re: Proposed Rule Changes on Immunization Reporting and Recommendations**

Dear Commissioner Brown,

On behalf of the New Jersey Health Care Quality Institute, I am writing in strong support of the Department's proposed rule changes that would:

1. Require all providers to report immunizations for people across the lifespan to NJIIS; and
2. Grant the Department flexibility to consider evidence and recommendations beyond ACIP, including those of nationally recognized health care advocacy organizations, when establishing vaccination requirements.

### **Support for Expanded Immunization Reporting**

Currently, providers are only required to report immunizations for children under seven years of age. Expanding reporting requirements to include all ages will significantly strengthen New Jersey's immunization infrastructure. By ensuring that patients, providers, and public health officials have access to comprehensive, up-to-date records, we can improve care coordination, reduce missed opportunities for vaccination, and better prepare for emerging public health threats. A robust, statewide immunization information system is essential for protecting individuals across their lifespans and for safeguarding our communities.

### **Support for Evidence-Based Flexibility Beyond ACIP**

We also commend the Department for recognizing the need to look beyond the ACIP and CDC for establishing immunization requirements to protect public health. This rule change will allow the Department to consider the recommendations of nationally recognized and trusted medical organizations when determining requirements.

As I stated in two op-eds on this topic, New Jersey can no longer risk relying solely on federal agencies for immunization guidance. We commend the Department for acting decisively in the face of public health threats (["New Jersey Must Act to Protect Public Health from Federal Sabotage"](#) and ["New Jersey Must Look Beyond CDC for Vaccine Strategy and Act Now"](#)). By adopting this rule, the Department

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demonstrates foresight and a commitment to evidence-based decision-making that prioritizes the health of New Jersey residents.

These proposed changes represent critical steps toward building a stronger, more resilient public health infrastructure in New Jersey. The Quality Institute is proud to lend its support, and we stand ready to assist the Department in advancing this important work.

Thank you for your leadership and commitment to protecting the health of all New Jerseyans.

Sincerely,

Linda Schwimmer  
President and CEO  
New Jersey Health Care Quality Institute