



STREAMLINE TEXAS' IMMUNIZATION REGISTRY

How Does Texas' Current Opt-in System Work?

When an individual is vaccinated, they, or their parent or guardian, can consent for their vaccination records to be entered into the state's vaccine registry, ImmTrac2.

This helps physicians, health departments, and other vaccine administrators know what diseases the individual is protected against and ensures the recommended vaccine schedule is followed. This is especially important during a vaccine-preventable disease outbreak.



Problems With an Opt-In System¹

- Once minors become an adult, and before turning 26-years-old, they must consent for their vaccine records to stay in ImmTrac2. Otherwise, their vaccine records are destroyed.²
- If a patient, parent, or guardian of a minor patient chooses to withdraw from ImmTrac2, it eliminates vaccine records and any indication of previous enrollment in that system. But since consent is typically also saved in the patient's electronic health record (EHR), they are indicated as a consenting person to the vaccine administrator. This means those who previously administered vaccines to the patient will not know the individual withdrew consent. The below scenario is an example of the issue this creates:
 - At time of vaccination an individual consents at location A
 - The individual later withdraws consent at location B
 - The individual then receives subsequent vaccinations at location A and the vaccine administrator documents the vaccine in their records



The vaccine administrator has no way of knowing the person's consent was withdrawn – resulting in a violation of the person's documented preference.

The Solution: Convert to an Opt-out System With Notation of Patient Preference

An opt-out system should allow anyone to delete their ImmTrac2 records if they wish but add a notation that they have withdrawn from ImmTrac2, ensuring the person's withdrawal request is honored and supersedes consent previously obtained.



THE TEXAS PUBLIC HEALTH COALITION RECOMMENDS:

1. **Change ImmTrac2 from an opt-in public participation to an opt-out public participation registry (HB 325/SB 468).**
2. **Incorporate a process into the system so patient preference is honored regardless of where the person receives vaccines. This could resemble the European Union's model of "right to be forgotten" for non-consenters.³**
3. **Allow previously consented childhood vaccination records to follow the person when they become an adult unless there is a specific request to withdraw from ImmTrac2. Ensure those individuals are notified of their option to opt-out.**
4. **In order to simplify consent barriers:**
 - More clearly define who qualifies as a first responder.
 - Eliminate the need for a separate consent for disaster situations. Include this as an option within the existing adult and minor consent forms.

¹ ImmTrac2 Immunization Registry User Manual, Texas Department of State Health Services, Version 1.0. Last Updated March 30, 2017. <https://www.dshs.texas.gov/immunize/docs/11-14955.pdf>

² Texas Health and Safety Code § 161.007

³ Art. 17 General Data Protection Regulation (GDPR) Right to erasure ('right to be forgotten')



The Texas Public Health Coalition is a coalition of health professional organizations and health-focused organizations dedicated to disease prevention and health promotion.

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