



# Virginia Department of Planning and Budget **Economic Impact Analysis**

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**12 VAC 5-115 Virginia Immunization Information System**  
**Virginia Department of Health**  
**Town Hall Action/Stage: 6594 / 10499**  
May 15, 2025

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The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with § 2.2-4007.04 of the Code of Virginia (Code) and Executive Order 19. The analysis presented below represents DPB’s best estimate of the potential economic impacts as of the date of this analysis.<sup>1</sup>

## **Summary of the Proposed Amendments to Regulation**

Following a 2024 periodic review,<sup>2</sup> the State Board of Health (Board) proposes to amend and update the regulation to accurately reflect the current paperless functioning of the online Virginia Immunization Information System (VIIS).

## **Background**

The VIIS system contains the birth to death immunization histories of individuals by collecting and merging data from various sources. According to the Virginia Department of Health (VDH), this system is vital to ensuring that immunization data is readily available to providers and other health care entities so that they can provide timely and appropriate patient care in cases where immunization information is pertinent. The system also helps public health efforts to control and prevent vaccine-preventable diseases and effectively respond to public health emergencies (e.g., pandemics).

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<sup>1</sup> Code § 2.2-4007.04 requires that such economic impact analyses determine the public benefits and costs of the proposed amendments. Further the analysis should include but not be limited to: (1) the projected number of businesses or other entities to whom the proposed regulatory action would apply, (2) the identity of any localities and types of businesses or other entities particularly affected, (3) the projected number of persons and employment positions to be affected, (4) the projected costs to affected businesses or entities to implement or comply with the regulation, and (5) the impact on the use and value of private property.

<sup>2</sup> <https://townhall.virginia.gov/L/ViewPReview.cfm?PRid=2470>

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The VIIS regulation sets rules for all providers and health care entities on the appropriate use of VIIS by defining protocols related to authorized participants, registration procedures, patient confidentiality, security, data entry and quality assurance, data release, data access, and forms. VDH reports that sometime in 2018 or 2019, VIIS has transitioned fully into a paperless online system. The transition has rendered paper-based forms and the regulatory language regarding paper transactions obsolete. Thus, following the periodic review, the Board proposes to amend and update the regulation to accurately reflect the current paperless functioning of the VIIS system. More specifically, the amended language mainly pertains to updating definitions; provider registration, onboarding, training processes; patient opt-out process; the list of demographic information currently collected if available (e.g., e-mail, race, and ethnicity) and no longer collected (e.g., social security number) since the transition; the time frame of data reporting as needed to reflect the current reporting timeframes (e.g., three days compared to the seven days used with the paper based system); and repealing paper based forms.

### **Estimated Benefits and Costs**

According to VDH, the fully electronic paperless immunization information system has been in place since 2018-2019 period. However, the regulatory language, particularly the portions addressing forms and paper-based processes, is out of date. The proposed amendments would update the language to accurately reflect how the fully electronic, paperless system processes work in practice.

VDH believes that replacing or removing manual forms/processes and transitioning activities to the electronic portal likely improved the efficiency of VIIS registration, onboarding, and reporting of immunization-related data. For health care providers and health care entities required to report, electronic reporting is probably more cost effective compared to faxing or mailing paper reports because those methods cost money for postage, fax lines, and paper. There may have been also a reduction in staffing costs through more efficient processes and a reduction in labor necessary to process paper forms. However, since the new system has been in place for over six years, the proposed changes to the regulation are not expected to create any economic impact other than improving the accuracy of the text's description of the processes and rules currently followed.

## **Businesses and Other Entities Affected**

The current regulation applies to health care providers, local health departments, and other entities that provide patient immunizations. VDH reports that there are a total of 6,147 active entities using VIIS (i.e., 222 public health providers, 423 pediatricians, 864 family practices, 172 hospitals, 1,182 pharmacies, 320 school/college/childcare entities, 216 community care entities, 1,067 other organizations, 1,665 other medical specialties, and 16 health plans). In a given year, approximately seven million vaccination reports are received through VIIS. No entities appear to be disproportionately affected.

The Code of Virginia requires DPB to assess whether an adverse impact may result from the proposed regulation.<sup>3</sup> An adverse impact is indicated if there is any increase in net cost or reduction in net benefit for any entity, even if the benefits exceed the costs for all entities combined.<sup>4</sup> The proposal does not increase costs or reduce benefits for any entity. Thus, no adverse impact is indicated.

### **Small Businesses<sup>5</sup> Affected:<sup>6</sup>**

The proposed amendments do not appear to adversely affect small businesses.

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<sup>3</sup> Pursuant to Code § 2.2-4007.04(D): In the event this economic impact analysis reveals that the proposed regulation would have an adverse economic impact on businesses or would impose a significant adverse economic impact on a locality, business, or entity particularly affected, the Department of Planning and Budget shall advise the Joint Commission on Administrative Rules, the House Committee on Appropriations, and the Senate Committee on Finance.

<sup>4</sup> Statute does not define “adverse impact,” state whether only Virginia entities should be considered, nor indicate whether an adverse impact results from regulatory requirements mandated by legislation. As a result, DPB has adopted a definition of adverse impact that assesses changes in net costs and benefits for each affected Virginia entity that directly results from discretionary changes to the regulation.

<sup>5</sup> Pursuant to § 2.2-4007.04 of the Code of Virginia, small business is defined as “a business entity, including its affiliates, that (i) is independently owned and operated and (ii) employs fewer than 500 full-time employees or has gross annual sales of less than \$6 million.”

<sup>6</sup> If the proposed regulatory action may have an adverse effect on small businesses, Code § 2.2-4007.04 requires that such economic impact analyses include: (1) an identification and estimate of the number of small businesses subject to the proposed regulation, (2) the projected reporting, recordkeeping, and other administrative costs required for small businesses to comply with the proposed regulation, including the type of professional skills necessary for preparing required reports and other documents, (3) a statement of the probable effect of the proposed regulation on affected small businesses, and (4) a description of any less intrusive or less costly alternative methods of achieving the purpose of the proposed regulation. Additionally, pursuant to Code § 2.2-4007.1, if there is a finding that a proposed regulation may have an adverse impact on small business, the Joint Commission on Administrative Rules shall be notified.

**Localities<sup>7</sup> Affected<sup>8</sup>**

The proposed amendments do not introduce costs for localities, nor do they disproportionately affect any locality.

**Projected Impact on Employment**

The proposed amendments do not appear to affect total employment.

**Effects on the Use and Value of Private Property**

No effects on the use and value of private property nor on real estate development costs are expected.

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<sup>7</sup> “Locality” can refer to either local governments or the locations in the Commonwealth where the activities relevant to the regulatory change are most likely to occur.

<sup>8</sup> § 2.2-4007.04 defines “particularly affected” as bearing disproportionate material impact.