

FAQ on Commissioner’s Advisory Directing Health Care Providers to Offer Unvaccinated Patients Information on the COVID-19 Vaccine and to Administer the Vaccine or Refer Unvaccinated Patients

This document answers frequently asked questions about [Commissioner’s Advisory](#), effective September 9, 2021. The advisory directs all applicable health care providers or their designees serving patients in New York City (NYC) to offer their patients who have not received a COVID-19 vaccine information on the efficacy, availability and administration of COVID-19 vaccines authorized or approved by the Food and Drug Administration (FDA). Information should be offered at each patient visit. If a patient agrees to have a COVID-19 vaccination, their health care provider or designee shall either offer to administer the vaccine to the patient if authorized or refer the patient to another health care provider or facility who can lawfully administer the vaccine to the patient. Find more information about the Commissioner’s Advisory at the [Vaccine Information for Providers](#) webpage.

Who must follow the Commissioner’s Advisory?

The Commissioner’s Advisory covers health care providers who are serving patients ages 12 and over in inpatient hospitals, emergency departments, outpatient clinics and primary care offices in NYC, and includes physicians, physician assistants, nurse practitioners and midwives. This includes both in-person and telehealth visits. Other care team members can offer the information if they are working under the direct supervision of the health care provider and the health care provider ensures there is documentation in the medical record that that vaccine was given, and an offer of the vaccine or referral to get vaccinated was provided to patients who agree to be vaccinated.

In inpatient and emergency department settings where patients may have multiple health care providers, the primary health care provider (e.g., the provider on record) will be responsible for providing vaccine information, offering or referring the vaccine to patients who agree to be vaccinated, and documenting it in the patient’s medical record.

The following exceptions apply:

- When the patient is being treated for a life-threatening emergency
When the patient is comatose or determined by the attending health care provider to lack mental capacity to consent
- When the patient is a minor. If the patient is between the ages of 12 and 17, vaccine information and offer or referral of the vaccine should be provided to the parent or guardian.
- When the patient has a medical contraindication to all available COVID-19 vaccines, consistent with current Centers for Disease Control and Prevention (CDC) Clinical Considerations.

Where can I find resources on how to have vaccine conversations?

The NYC Health Department has guides, tip sheets, and webinars to help health care providers build vaccine confidence with patients and staff. These resources can be found at [COVID-19: Vaccine Communication Resources for Providers](#).

What steps can I follow to help make sure I am offering vaccination at all visits?

The [COVID-19 Vaccine Use Every Opportunity checklist](#) can help you incorporate steps to ensure every patient who is not vaccinated is offered a vaccine during their encounters with your practice. This framework is an adaptable tool for implementing workflows to achieve the highest level of COVID-19 vaccine coverage. Health care providers are reminded to offer COVID-19 vaccine at every opportunity, including routine patient visits. If necessary, open a new vial of COVID-19 vaccine to vaccinate even a single eligible person. There is no penalty if it is not possible to use the remaining doses in the vial.

Create non-patient specific (standing) orders for COVID-19 vaccines so registered nurses can administer COVID-19 vaccines independently. ([Pfizer-BioNTech](#); [Moderna](#); [Johnson & Johnson/Janssen](#))

Point-of-care reminders can also boost vaccine administration. Some electronic health records (EHRs) can be programmed to issue a best practice alert notifying the health care provider if the patient being seen has already received the vaccine. These alerts can substantially increase documented vaccine discussions and vaccination rates. Check with your IT department or EHR vendor for more information. You can also refer to [NYC REACH](#).

What if I am not vaccinating patients at my practice?

- Help your patients find a vaccination site convenient for them. You can even make an appointment for them if they want. Here's how: Use the [NYC COVID-19 Vaccine Finder](#) (not accessible in Internet Explorer) to find a walk-up site or make an appointment.
- Complete the [In-Home Vaccination Request Form](#) to receive the vaccine at home.
- For assistance, call the NYC Vaccine Provider Hotline: 877-VAX-4NYC (877-829-4692).

Health care providers may choose to help schedule an appointment for a patient.

- Use the [Vaccine Appointment Request Form](#) to request that the NYC Vaccine Hotline call a patient to set up a vaccine appointment. Patients will receive a call within 48 hours.
- Call the NYC Vaccine Provider Hotline at 877-VAX-4NYC (877-829-4692) and press 2 at the second prompt to schedule an appointment for a patient.
- Post [this flyer](#) in your office, available in multiple languages.

If I already spoke to a patient about the vaccines, and they are not open to getting vaccinated, do I need to speak to them about it again?

Health care providers are strongly advised to provide vaccine information to their patients who are not vaccinated at each patient visit. A patient who was initially hesitant about the vaccines may have follow-up questions or may have changed their mind since their last visit. Like other behavioral changes such as quitting tobacco, an individual's readiness and motivation are important factors in the decision-making process. Make sure to document all counseling provided to each patient during each visit, including information about the patient's hesitancy. Many EHRs allow health care providers to upload patient education, making it easy to review educational materials with patients during each visit. For more EHR tips, refer to NYC REACH.

How do I document that I discussed vaccination facts and made appropriate referrals for vaccination in my EHR?

Health care providers should document in a patient's medical record that they provided the vaccine information, acceptance or refusal of the vaccine, and for patients who agree to be vaccinated, offered the vaccine to or referred to a vaccination site.

It is a good practice to standardize your documentation. Documentation of counseling can typically be recorded in treatment plan section of the EHR. Additionally, most EHRs have a section to document referrals, which is an ideal location to document referrals to vaccination sites and to generate a referral letter with important information for patients. For more EHR tips, refer to NYC REACH.

Health care providers should document all COVID-19 vaccines administered, regardless of location. Health care providers are encouraged to check the Citywide Immunization Registry (CIR) if they don't have a COVID-19 vaccination documented and upload the patient's history to their own system. Missing doses or doses received outside of NYC (out of state or out of the country) should be entered into the CIR or through their EHR and uploaded to the CIR if they have a bidirectional interface.

The NYC Health Department strongly encourages health care providers to document all relevant information in the patient's medical record, including vaccine manufacturer, exact date(s) of administration (month, day, year), and location administered. Even if a dose given elsewhere was already recorded in the CIR, it could be overlooked at a future visit or by other health care providers if it is not recorded in your own EHR. Including immunization details in the same system as other patient care information improves continuity of care. Many practice settings connect to the CIR through their EHR and data exchange happens automatically. For many, this exchange can be *bi-directional*: both sending immunization information from the health care provider's EHR to CIR and retrieving external immunization information from CIR into the provider's EHR. The following EHRs can integrate bi-directionally with CIR: Adaptamed, ADS, Allscripts, Amazing Charts, Athenahealth, Cerner, Criteria, CureMD, Cybermed, DigiDMS, eClinicalWorks, Empower MD, Epic, GE Centricity, Glenwood/Glace, IBM Websphere, iPatientCare, Ironbridge, Kareo, MDLand, Medent, MedGen, Mediat, MTX, NextGen, Office

Practicum, PioneerRx-Stc, Point N Click, Practice Fusion, Prescribewellness. Check with your IT department or EHR vendor for more information.

For more information on the CIR, including how to [enroll your practice](#), how to look up a patient's vaccination information, or if you think you may be registered and have forgotten your facility code, visit the [NYC Health Department's CIR page](#).

A reminder to health care providers: it is important to document race and ethnicity to identify needed improvements in health care, and for identification of individuals or population groups that might be the focus of interventions designed to address health care needs. Additionally, documenting a cell phone number and email can help facilitate people obtaining their records through CIR or the New York State (NYS) Excelsior Pass.

Will I need to submit documentation?

There is currently no requirement to report patient referrals or conversations about vaccines to a NYC or NYS entity, but as noted above, your medical record should include documentation of the discussion with each unvaccinated patient at every visit and offer, or referral for vaccination for patients who agree to be vaccinated.

Do I need to document a patient's COVID-19 vaccination if they received it at another facility?

Health care providers should document all COVID-19 vaccines administered, regardless of location. The NYC Health Department strongly encourages health care providers to document all relevant information in the chart including vaccine manufacturer, date(s) of administration, and location administered. Even if a dose given elsewhere was already recorded in the CIR, it could be overlooked at a future visit or by other health care providers if it is not recorded in your own EHR. Including immunization details in the same system as other patient care information improves continuity of care.

If your EHR does not automatically exchange information with the CIR, most EHRs have a built-in immunizations activity field that allows providers to document vaccines administered both at your practice and elsewhere. This is the ideal place in the chart to document. If your EHR does not provide this feature, document COVID-19 vaccination in a Medical History, Preventive Medicine, or Health Maintenance section of the chart. Record this information as structured data (as opposed to free text). Advantages of having every COVID-19 vaccine dose, even prior doses, recorded in your own EHR include improving documentation of any vaccine contraindications, reducing medical discrepancies, and having date and type of vaccine readily accessible. If set up to do so, an EHR can also automatically generate alerts relevant to COVID-19 vaccination, such as the need for a future dose or specific recommendations for follow-up in case of exposure to someone with COVID-19. For more EHR tips, refer to [NYC REACH](#).

Does sending a patient a message through the EHR patient portal, text message or email count?

It's important to speak with your patient at every patient visit even if you communicate with patients who are unvaccinated in between patient visits. Messages sent through the EHR patient portal, text message or email are valuable communication tools when you cannot speak with the patient in person or via telehealth. Here are some sample templates your practice can use to message unvaccinated patients through the EHR patient portal or email.

Example messages for practices that ARE NOT administering COVID-19 vaccines

1. For emails and patient portal messages with no character limit:

Hello,

We at [practice] recommend you get vaccinated against COVID-19. The COVID-19 vaccines are safe, effective and free. You can get vaccinated by making an appointment, visiting a walk-in site or requesting a vaccination at home!

- *Use the [NYC COVID-19 Vaccine Finder](#) (not accessible in Internet Explorer) to find a walk-up site or make an appointment*
- *Complete the [In-Home Vaccination Request Form](#) to receive the vaccine at home*
- *For assistance, call the NYC Vaccine Provider Hotline: 877-VAX-4NYC (877-829-4692)*
- *Visit the [COVID-19 Vaccine Webpage](#) for more information*

If you have any questions about the COVID-19 vaccines or how to get vaccinated, contact us at [email] or [phone number].

*Thank you,
[Practice]*

2. For text messages (140-character limit):

Msg from Dr. [Name]: Our records show you are due for a COVID-19 vaccine. Visit vax4nyc.nyc.gov or call 888-VAX-4NYC to get vaccinated.

Example message for practices that ARE administering COVID-19 vaccines:

1. For emails and patient portal messages with no character limit:

Hello,

We have the [brand(s)] COVID-19 vaccine reserved for you. Please contact us at [email] or [phone] or use the patient portal to schedule a vaccination appointment. If you have an office visit coming up, you can receive the vaccine during your visit. You will not be charged a copay for the vaccine. The vaccine is safe and effective, and we encourage all eligible patients to get vaccinated.

Please contact us with any questions. Visit the NYC Health Department's [COVID-19 Vaccine webpage](#) to learn more about COVID-19 vaccines.

Thank you,
[Practice]

2. For text messages (140-character limit):

Msg from Dr. [Name]: Our records show you are due for COVID-19 vaccine. Please call us at XXX-XXX-XXXX to schedule an appt.

Will I be reimbursed for the time spent having this conversation?

Health care providers should contact health plans to determine if services will be reimbursed. Health plans may reimburse time spent counseling or educating patients to get vaccinated as a component of the E&M level of service. For example, if a 20-minute patient visit with a patient with diabetes is extended to 30 minutes because an additional 10 minutes was spent discussing the COVID-19 vaccine, a health care provider can code 99214 (which requires 30 minutes). Health care providers can alternatively code for preventive medicine counseling using CPT codes 99401 (15 minutes counseling) or 99402 (30 minutes counseling). Additionally, some health plans will be offering reimbursement specifically for providing unvaccinated patients with information on the efficacy, availability and administration of the COVID-19 vaccines as a standalone service. For more information visit the [Vaccine Information for Providers](#) webpage.

How does the NYC Health Department support practices that want to start offering the vaccine?

The NYC Health Department provides education and training for practices that administer COVID-19 vaccines to their patients. If your practice would like to start administering vaccines, follow the [Instructions For Enrolling In The COVID-19 Vaccination Program](#). Email the CIR team at cir@health.nyc.gov with any questions about how to join. For questions about completing the COVID-19 Vaccination Program Provider Agreement in the CIR, email COVIDVax@health.nyc.gov.

Where can I learn more?

For questions about the Commissioner's Advisory, contact the Provider Access Line at 866-692-3641.

Resources for providers:

Talking with Patients about COVID-19 Vaccines

Visit nyc.gov/vaccinetalks for resources including:

- Building Confidence in COVID-19 Vaccines
- COVID-19 Vaccines: Frequently Asked Questions for Providers
- Addressing Patients' COVID-19 Vaccine Questions: A Guide for Health Care Providers
- Speaking with Parents About COVID-19 Adolescent Vaccination

Practice Workflow

- [COVID-19 Vaccine Use Every Opportunity Checklist](#)
- NYC REACH

Citywide Immunization Registry

- [CIR Quick Facts](#)
- [CIR webpage](#)

Patient Handouts

- **Infographic:** [How the mRNA COVID-19 Vaccines Work](#) (PDF)
Other Languages: [Español](#) | [Русский](#) | [繁體中文](#) | [简体中文](#) | [Kreyòl ayisyen](#) | [한국어](#) | [বাংলা](#) | [Italiano](#) | [Polski](#) | [עברית](#) | [العربية](#) | [Français](#) | [اردو](#)
- **Infographic:** [How the Johnson & Johnson COVID-19 Vaccine Works](#) (PDF)
Other Languages: [Español](#) | [Русский](#) | [繁體中文](#) | [简体中文](#) | [Kreyòl ayisyen](#) | [한국어](#) | [বাংলা](#) | [Italiano](#) | [Polski](#) | [العربية](#) | [Français](#) | [עברית](#) | [اردو](#)
- [FAQ About COVID-19 Vaccines for Families](#)
- [Palm Card: What New Yorkers Need to Know About COVID-19 Vaccines](#)
- [Poster: What New Yorkers Need to Know about COVID-19 Vaccines](#)
- [Flyer: The Truth About COVID-19 Vaccines](#)