

Testimony
House Bill No. 1467
House Human Services Committee
Representative Ruby, Chairman
February 4th, 2025

Chairman Ruby, and members of the House Human Services Committee, I am Molly Howell, Immunization Director with the Department of Health and Human Services (Department). I appear before you in opposition of House Bill No. 1467.

House Bill No. 1467 will require healthcare providers to report suspected vaccine adverse events and administration errors to both the federal Vaccine Adverse Events Reporting System (VAERS) and the newly created state system outlined in Section 2. Duplicate reporting places a burden on healthcare providers and may lead to fatigue in reporting to one or both systems, making it difficult for VAERS to identify potential and important vaccine safety signals. House Bill No. 1467 also has a fiscal impact on the Department, which is greater than the appropriation in Section 3.

VAERS is one of many vaccine safety surveillance systems in the United States. Anyone can submit a report to VAERS. VAERS serves as an early warning system to identify vaccine safety signals that need further study in other national vaccine safety surveillance systems. VAERS cannot determine that a vaccine caused the reported adverse event. VAERS is unable to determine if the rate of an event is happening more in vaccinated individuals than unvaccinated individuals, because VAERS does not include a comparison group (unvaccinated).

Section 2:

Section 2 requires the Department to “administer a system to record and compile reported vaccine adverse event data.” The National Childhood Vaccine Injury Act of 1986 requires healthcare providers to report vaccine adverse events to the federal VAERS system. Vaccine administration errors may also be reported. The federal VAERS system requires manual data entry. There is not an ability to upload data from a North Dakota system. Therefore, healthcare providers will have to report the same data to both systems.

Last session, House Bill No. 1207 passed, which required the Department to maintain a [website](#), which includes instructions on how to download VAERS data and a link for reporting to VAERS. Reported vaccine adverse events for North Dakotans can be downloaded from the federal VAERS system.

Section 3:

The appropriation included in House Bill No. 1467 is \$100,000 and is not adequate. The Department received an estimate from ND Information Technology in the amount of \$110,585 to develop a state VAERS system. Additionally, NDIT estimates annual maintenance at \$59,585. The Department will also need an FTE and supporting costs (i.e., IT fees, data storage, rent) to oversee the development of the system, education of healthcare providers, website maintenance, and analysis of data for required reporting at a total of \$294,346.05 for the biennium. There is also a small, estimated impact (\$13,388) to local public health for data entry into the state VAERS system. The total estimated cost for House Bill No. 1467 for the 2025-2027 biennium is calculated at \$478,119.05.

This concludes my testimony. I would be happy to try to answer any questions the committee may have. Thank you.