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November 18, 2025

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Via Email: Jacob.Clark@doh.nm.gov

Subject: Concerns Regarding Proposed Rule 7.5.5 NMAC – Statewide Immunization Registry

Dear Mr. Clark,

I appreciate the opportunity to provide comments on the proposed revisions to **7.5.5 NMAC**, governing the New Mexico Statewide Immunization Registry. While we support efforts to improve immunization tracking and public health outcomes, we have several concerns regarding the operational, privacy, and compliance implications of the proposed rule:

Data Elements and Privacy Risks

The proposed rule mandates inclusion of highly detailed data elements, including **National Drug Code (NDC) numbers for vaccines, insurance status, and insurance information**. While clinical details like vaccine type are important, requiring NDC numbers and full insurance details introduces unnecessary complexity and increases the risk of data breaches. Additionally, these elements are not essential for public health surveillance and may deter patient participation.

Recommendation:

- Limit required data to essential clinical and demographic elements (e.g., vaccine type, date, patient age).
- Remove requirements for NDC numbers and insurance information, or make them optional for providers who already capture this data for billing purposes.
- Provide clear guidance on encryption and security standards for any sensitive data transmitted.

We strongly encourage the Department to consider these recommendations to ensure the rule achieves its public health objectives without imposing undue burdens or compromising patient privacy.

Sincerely,

Lorri Walmsley, RPh, FAzPA
Director, Pharmacy Affairs