

Published Articles

The New Vaccine Patchwork: State Alliances and Regulatory Shifts

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In recent weeks, vaccine policy has become a flashpoint at the state level. On September 3, 2025, the governors of Oregon, California, and Washington inaugurated a West Coast Health Alliance, a regional partnership aimed at preserving scientific integrity in vaccine policy amid growing skepticism toward federal health leadership. Through this partnership, the three states will start coordinating health guidelines by aligning immunization recommendations informed by respected national medical organizations and scientific evidence-based recommendations from trusted scientists, clinicians, and other public health leaders. While each state will independently pursue strategies shaped by their unique demographics, geographics, and laws, the Alliance's coordinated plan is intended to ensure consistency and transparency across the West Coast in determining who should receive vaccines and under what circumstances.

In subsequent developments, Hawaii announced it would join the Alliance, expanding the collaboration to four states united behind evidence-driven immunization recommendations, respecting tribal sovereignty, and acknowledging each jurisdiction's unique regulatory needs.

By contrast, Florida has moved in the opposite direction. Florida surgeon general, Joseph Ladapo, stated on September 3 that the state plans to end all state vaccine mandates, including for students to attend schools. Ladapo said his agency would roll back mandates for a half-dozen or so vaccines under its authority but that the agency will need to work with the Florida legislature on a broader package of reforms. He did not specify which vaccine mandates his agency would do away with.

Currently, all states have vaccine requirements to attend public schools with specific exceptions that vary by state (mainly for medical and religious reasons). This move to reverse the vaccine mandate for school children, and possibly a larger group, shows a significant shift in state-

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level policy and signals growing divergence nationwide.

What This Means for New Jersey Providers and Health Systems

These developments highlight how states are increasingly asserting authority over vaccine policy, diverging from federal standards. While most states have historically aligned closely with CDC guidance, the current climate suggests we may see greater variability in immunization requirements, school-entry rules, and employer/healthcare provider obligations.

For New Jersey providers, this trend matters for several reasons:

- **Regulatory Drift:** If states like California or Florida test new approaches, others may follow, either strengthening or loosening requirements.
- **Compliance Complexity:** Multi-state providers, payors, and vendors will need to navigate inconsistent state rules.
- **Future in NJ:** New Jersey could face pressure to adopt its own state-specific vaccine policies if public confidence in federal guidance erodes further.

Greenbaum's Healthcare team is actively monitoring these state-led initiatives. We are prepared to advise physician groups, health systems, and management companies on compliance with evolving immunization requirements, the potential need to adjust policies for multi-state operations, and any state-specific rulemaking that could impact school-based, workplace, and clinical vaccination obligations.

We will continue to track these developments and provide updates on how they may affect your compliance obligations in New Jersey and beyond. Please contact the author of this Alert with questions or to discuss your specific business circumstances.

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