

March 23, 2015

Rebecca Fish
Senior Policy Advisor
National Vaccine Program Office
Department of Health and Human Services
Washington, D.C. 20515

Re: Solicitation of Written Comments on the Draft National Adult Immunization Plan

Dear Ms. Fish:

As participants in the Adult Vaccine Access Coalition (AVAC), we appreciate this opportunity to comment on the HHS National Vaccine Program Office's (NVPO) National Adult Immunization Plan (NAIP).

AVAC consists of leaders in health and public health that are committed to tackling the range of barriers to adult immunization, to raise awareness of and to engage in advocacy on the importance of adult immunization. Our mission is informed by a growing body of scientific and empirical evidence of the benefits of immunization by improving health, and protecting lives against a variety of debilitating and potentially deadly conditions, as well as by saving costs to the healthcare system and to society as a whole.

AVAC priorities and objectives are driven by a consensus process with the goal of enabling the range of stakeholders to have a voice and a stake in the effort to improve access and utilization of adult immunizations. The NAIP comes at a critical time. National immunization campaigns to protect the population against vaccine-preventable diseases have been one of our most significant public health achievements, particularly among children. Despite this success, challenges and barriers continue to hinder efforts to achieve widespread immunization coverage in adult populations and as a result, significant disparities persist.

Importantly, the plan focuses on four key areas that will have the greatest impact on adult immunization rates: 1) Strengthen the adult immunization infrastructure; 2) Improve access to adult vaccines; 3) Increase community demand for adult immunizations and 4) Foster innovation in adult vaccine development and vaccination-related technologies. Complimenting these four goals are a set of targeted indicators and strategies that will benchmark and guide progress toward the four objectives.

AVAC member organizations similarly support improving access to and utilization of vaccines by reducing technological, logistical, geographic, socio-economic, and financial barriers to the full complement of ACIP-recommended adult immunizations. As you work to finalize the NAIP, we encourage you to prioritize the objectives and goals set forth in the plan. AVAC intends to prioritize certain goals and objectives that we have highlighted below as areas of common interest.

GOAL 1:

The first goal of the NAIP places a strong emphasis on the increasing role and importance of health information technology (HIT) and the need for systems and health care providers to be able to share and exchange immunization recommendations and data in a timely and accurate manner. While this goal lays out several important objectives, AVAC members most strongly support the following:

Objective 1.1: *Monitor and report trends in adult vaccine-preventable disease levels and vaccination coverage data for all ACIP-recommended vaccines. In cases where there are associated Healthy People 2020 goals, measure progress toward established targets.*

Surveillance data to more accurately evaluate coverage gaps and disparities, particularly among minority and vulnerable populations, are essential to improving the impact of adult immunization efforts and expanding coverage. AVAC coalition members are working on projects that seek to identify and enhance our understanding of coverage gaps and are developing pilot programs to test targeted solutions where these disparities currently exist.

Objective 1.4: *Increase the use of electronic health records (EHR) and immunization information systems (IIS) to collect and track adult immunization data.* The AVAC shares this view that advancements in HIT have the potential to vastly improve monitoring of vaccine preventable disease rates and vaccine coverage data in real time as well as to facilitate the exchange of data that can improve the quality of preventive care among targeted adult populations, and patient outcomes. We see utilization of HIT and greater interoperability between EHRs and IIS systems as integral for tracking adult vaccination status, which is the first step in identifying needs where efforts and resources should be prioritized.

We also support the goals behind **Objective 1.5** (*Evaluate and advance targeted quality improvement initiatives*) and **Objective 1.6** (*Generate and disseminate evidence about the health and economic impact of adult immunization, including potential disease burden averted and cost-effectiveness with the use of current vaccines*). The latter objective should be prioritized and advanced quickly since this research will lay the groundwork for many other aspects of the NAIP. Quality improvement initiatives called for in Objective 1.5 are also a critical element to ensuring meaningful progress toward NAIP goals and objectives. AVAC members look forward to working with you in the development, evaluation and dissemination of these measures and metrics.

GOAL 2:

The second goal of the NAIP to improve access to adult vaccines is also critically important and is a core tenet for AVAC. The four objectives specified within this goal each include aspects that we support overall.

In general, we agree with **Objective 2.1** (*Reduce financial barriers for individuals who receive routinely recommended vaccines for adults*) and **Objective 2.2** (*Assess and improve understanding of providers' financial barriers to delivering vaccinations, including stocking and*

administering vaccines) and look forward to working with you toward deepening our understanding and further refining some of the specific elements articulated under each of these objectives.

Tackling the financial barriers that prevent adults from receiving recommended immunizations and hinder the ability of providers to stock and supply vaccines is essential to the ultimate success of the NAIP. Removing financial barriers will also contribute toward advancing

Objective 2.3 (*Expand the adult immunization provider network*) and **Objective 2.4** (*Ensure a reliable supply of vaccines and the ability to trace vaccine inventories, including during public health emergencies*). Predictable and timely supply will encourage a broader network of providers and sites (including the workplace) to offer immunizations to adult populations.

The Patient Protection and Affordable Care Act included provisions intended to improve access to adult immunization, yet barriers remain. In addition, fragmented coverage of ACIP recommended vaccines across Medicare Parts B and D and disparities in Medicaid coverage of vaccines across states (and even across eligible populations within a state) present significant barriers to vaccine access and utilization. Taking action to address these coverage challenges would be a significant accomplishment and would greatly improve access to immunization services for adults.

AVAC intends to develop an advocacy plan to tackle financial barriers to adult immunization that will include a review of public and private coverage of adult immunizations and solicit input from the range of our members on the financial barriers they perceive to be greatest. We look forward to sharing our findings and plan with you and other federal and non-federal stakeholders who will be involved in this effort.

GOAL 3:

Increasing community demand for adult immunizations, the third goal of the NAIP, also highlights an important aspect where greater attention and concerted effort is desperately needed in terms of the adult population. Education and awareness of the importance of immunization should be closely linked with efforts to improve access. The second and third goals of the NAIP should be viewed and pursued in tandem.

We appreciate that **Objective 3.1** (*Educate and encourage individuals to be aware of and receive recommended adult immunizations*) places an emphasis on communication activities that are strategic, evidence-based, culturally-appropriate and reflect the health literacy, language proficiency and functional and access needs of specific target populations.

Objective 3.2 (*Educate and encourage health care professionals to recommend and/or deliver adult vaccines*) will be most impactful if barriers to access have been effectively addressed.

Additionally, efforts to advance **Objective 3.3** (*Educate and encourage other groups to promote the importance of adult immunization*) will result in an expanded network of adult immunizers and broaden the number of sites offering immunization services to adult populations. Focus and regular outreach are essential to establishing vaccination as a routine part of preventive care and

building confidence in vaccination as a societal norm. We especially encourage initiatives aimed at boosting adult immunization rates among minority, at-risk, and vulnerable populations.

GOAL 4:

Lastly, innovation in adult vaccine development and vaccination-related technologies, goal 4 of the NAIP is important to building a sustainable foundation that will spur the development of next-generation vaccines and improve the effectiveness of current vaccine products against a host of preventable infectious diseases. Although AVAC is not focused on vaccine development and innovation, we recognize it as an important cornerstone that deserves attention and collaboration between federal and non-federal stakeholders.

CONCLUSION:

We applaud the NVPO for putting forth a National Adult Immunization Plan that lays out targeted goals, standards, and indicators for measuring progress in achieving those objectives. A focused, concerted approach to adult immunization with clear benchmarks and expectations of success are absolutely essential if we are going to reach Healthy People 2020 utilization and coverage targets for this population.

Stakeholder partners will play an essential role in helping bring the NAIP to fruition. AVAC shares in the common goals of reducing barriers and improving access and is dedicated to education and advocacy that will have a meaningful, positive, and lasting impact on adult immunization rates. We stand ready to work with NVPO and other federal and nonfederal stakeholders toward common solutions that will strengthen and enhance access and utilization of adult immunization across the health care system.

Thank you again for this opportunity to offer our perspective on the vision, goals and objectives of the National Adult Immunization Plan. Please contact the AVAC Coalition Manager at (202) 540-1070 or lfoster@nvgllc.com if you would like more information about AVAC or our work.

Sincerely,

American Academy of Family Physicians
American Association of Occupational Health Nurses, Inc.
American College of Preventive Medicine
American Pharmacists Association
American Public Health Association
Asian & Pacific Islander American Health Forum
Biotechnology Industry Organization
GSK
Hep B United
Hepatitis B Foundation
Immunization Action Coalition
Merck
National Association of County and City Health Officials

National Foundation for Infectious Diseases

National Indian Health Board

National Viral Hepatitis Roundtable

Pfizer Inc.

Sanofi Pasteur

Scientific Technologies Corporation

Takeda Vaccines, Inc.

Trust for America's Health