



AMERICAN ACADEMY OF
FAMILY PHYSICIANS
STRONG MEDICINE FOR AMERICA

March 4, 2015

Suzanne Johnson-DeLeon, Health Education and Information Specialist
National Center for Immunization and Respiratory Diseases
Centers for Disease Control and Prevention
1600 Clifton Road NE (Mailstop A-19)
Atlanta, Georgia 30329

RE: Proposed Revised Vaccine Information Materials for Multiple Pediatric Vaccines

Dear Ms. Johnson-DeLeon:

On behalf of the American Academy of Family Physicians (AAFP), which represents 115,900 family physicians and medical students across the country, I write in response to the [proposed](#) revised vaccine information materials for multiple pediatric vaccines as published by the Centers for Disease Control and Prevention (CDC) in the January 9, 2015 *Federal Register*.

Under authority of the *National Childhood Vaccine Injury Act*, the CDC develops vaccine information materials that all health care providers are required to give to patients/parents prior to administration of specific vaccines. It is AAFP [policy](#) to endorse the concept that all children and adults, regardless of economic and insurance status, should have access to all necessary immunizations. The AAFP believes that all public and private insurers should include, as a covered benefit, all necessary immunizations without co-payments or deductibles.

The AAFP believes that the vaccine manufacturers and distributors should have payment policies that minimize the physicians' financial risk involved in maintaining a vaccine inventory. Government programs (e.g., Vaccines for Children (VFC), 317 Immunization Grants, or state "universal purchasing") that subsidize the costs of vaccines at no cost to medical practices should be adequately funded by the federal and state government. Requiring clinicians to stock separate supplies of vaccines for the VFC Program and for persons covered by other payers can be burdensome and adds unnecessary administrative costs to practices. Therefore, AAFP recommends that states allow physicians to intermingle storage of VFC and other vaccine supplies, with appropriate documentation and cost accounting. The AAFP believes that the ultimate goal is to have vaccine manufacturers and distributors deliver adequate, timely, and complete orders of immunizations recommended by the AAFP to family physicians in a prioritized manner to most effectively achieve vaccination of patients within their medical home.

The AAFP strongly recommends that patients receive all necessary immunizations in their medical home. When recommended vaccines are provided outside of the medical home all pertinent vaccine related information should be provided to the patient's medical home.

www.aafp.org

| President | President-elect | Board Chair | Directors | |
|-------------------------------------|--------------------------------------|--|--|---|
| Robert L. Wergin, MD Milford, NE | Wanda Filer, MD York, PA | Reid B. Blackwelder, MD Kingsport, TN | Carlos Gonzales, MD, Patagonia, AZ Carl Olden, MD, Yakima, WA Lloyd Van Winkle, MD, Castroville, TX Yushu "Jack" Chou, MD, Baldwin Park, CA Robert A. Lee, MD, Johnston, IA Michael Munger, MD, Overland Park, KS | Mott Blair, IV, MD, Wallace, NC John Cullen, MD, Valdez, AK Lynne Lillie, MD, Woodbury, MN Emily Briggs, MD, MPH, (New Physician Member), New Braunfels, TX Andrew Lutzkanin, MD, (Resident Member), Ephrata, PA Kristina Zimmerman (Student Member), Dalton, PA |
| Speaker | Vice Speaker | Executive Vice President | | |
| John S. Meigs Jr., MD Brent, AL | Javette C. Orgain, MD Chicago, IL | Douglas E. Henley, MD Leawood, KS | | |

Where medical practices incur a cost for vaccines, the AAFP calls for adequate payment to the physician practice for the vaccine itself and all associated cost of overhead (acquisition, storage, inventory, insurance, spoilage/wastage, etc.) and administration with no patient cost-sharing.

The AAFP believes that vaccine manufacturers should develop contingency plans for the timing and prioritization of vaccine supplies if an ample supply of the appropriate immunizations is delayed and/or reduced.

Scientifically accurate vaccine information materials are important in facilitating an informed discussion between the clinician and caregiver of the child receiving the vaccine. The AAFP strongly supports the development and appropriate revisions of these materials and is pleased to continue its partnership with the CDC and American Academy of Pediatrics in developing and updating the *Provider Resources for Vaccine Conversations with Parents* resources.

We appreciate the opportunity to comment in support of this revised vaccination information materials for multiple pediatric vaccines. For any questions you might have, please contact Robert Bennett, Federal Regulatory Manager, at 202-232-9033 or rbennett@aafp.org.

Sincerely,

A handwritten signature in black ink that reads "Reid Blackwelder, MD" followed by a small "11" and a checkmark symbol.

Reid B. Blackwelder, MD, FAAFP
Board Chair