



March 1, 2024

Chiquita Brooks-LaSure  
Administrator  
Centers for Medicare and Medicaid Services  
7500 Security Boulevard  
Baltimore, MD 21244

**RE: Advance Notice of Methodological Changes for Calendar Year (CY) 2025 for Medicare Advantage (MA) Capitation Rates and Part C and Part D Payment Policies (docket number CMS-2024-0006)**

Dear Administrator Brooks-LaSure:

The Adult Vaccine Access Coalition (AVAC) appreciates the opportunity to comment on the Centers for Medicare and Medicaid Services (CMS) 2025 Medicare Advantage and Part D Advance Notice and Draft Call Letter.

Specifically, AVAC members:

- Greatly appreciate the inclusion of language reminding plans that any ACIP-recommended adult vaccine will continue to remain exempted from all beneficiary cost sharing, including the annual deductible or any other fees in all phases of the benefit for Calendar Year (CY)2025.
- Are grateful the annual flu vaccine measure will remain in the Star Ratings program for 2025 and strongly support the inclusion of the adult immunization status measure on the display page for future incorporation in the Star Ratings program.
- Encourage CMS to continue to closely monitor plan efforts to employ utilization management tools that hinder lawful provider choice and patient access to vaccines under Medicare Part D.

AVAC consists of more than seventy-five organizational leaders in health and public health who are committed to legislative and regulatory policy solutions to improve access and utilization of adult vaccines. Our mission is informed by scientific and empirical evidence that shows immunization improves health and protects lives against a variety of debilitating and potentially deadly conditions, saving costs to the healthcare system and society. AVAC priorities and objectives are driven by a consensus process with the goal of

enabling the range of stakeholders to have a voice in the effort to improve access and utilization of adult immunizations.

As your agency understands, high rates of adherence to the childhood, adolescent, and adult schedules of Advisory Committee on Immunization Practices (ACIP) recommended vaccines minimizes the burden of vaccine-preventable diseases across the life course. Unfortunately, access and utilization of vaccines is not equal across the person's life course. Despite the well-known benefits of immunizations, approximately 50,000 adults die each year from vaccine-preventable disease in the United States, while adult coverage remains below federal goals for most commonly recommended vaccines. Millions more adults suffer from vaccine-preventable diseases, causing them to miss work and leaving some unable to care for those who depend on them.

AVAC greatly appreciates the inclusion of language reminding plans that any ACIP-recommended adult vaccine will continue to remain exempted from all beneficiary cost sharing, including the annual deductible or any other fees in all phases of the benefit for Calendar Year (CY)2025. Studies have shown a direct correlation between high cost sharing and increased abandonment rates of vaccines in Medicare Part D. AVAC commends CMS for taking swift action to remove this barrier to beneficiary access. As Medicare beneficiaries take advantage of this important preventive benefit, we expect to see improved immunization rates for Medicare populations that will lead to improved direct and indirect health outcomes.

AVAC also gratefully appreciates that the annual flu vaccine measure will remain in the Star Ratings program for 2025 and strongly supports the inclusion of the adult immunization status measure on the display page for future incorporation in the Star Ratings program. The adult immunization status (AIS) measure is the result of several years of development, modification, and testing that will provide a sound, reliable and comprehensive means to assesses the receipt of routine adult vaccinations recommended by the Advisory Committee on Immunization Practices (ACIP).

AVAC appreciates the continued work and leadership by the National Committee for Quality Assurance (NCQA) and its partners to develop, modify, and test the adult immunization status (AIS) measure during a time when several new vaccines have been approved and recommended for adult populations, and while ACIP recommendations for some existing vaccines have been modified to reflect the latest evidence. Maintaining a robust and updated AIS measure helps streamline the patchwork of existing adult immunization measures, while providing meaningful data that helps the Medicare program better understand vaccination trends and assess potential gaps in vaccine coverage rates.

Lastly, AVAC would like to note an emerging issue that could have a negative impact on access to vaccines for Part D plan beneficiaries. In December, CMS leadership [acknowledged](#) in a letter to Part D plans and pharmacy benefit managers some challenges in compliance with new IRA vaccine coverage provisions. Specifically, CMS expressed its

concern about fair and transparent pricing for vaccines as well as other preventive services and highlighted the potential negative impact on pharmacies as well as beneficiary access. AVAC greatly appreciates CMS' early identification of this concerning issue and swift response to strongly urge plans (Medicare Part D, commercial and Medicaid/CHIP) to address it. We encourage CMS to continue to closely monitor this situation to ensure that the letter and spirit of the law is being followed and vaccine choice and beneficiary access are not unduly limited.

Thank you for the opportunity to offer our perspective on the 2025 Medicare Advantage and Part D Advance Notice and Draft Call Letter. We hope CMS will maintain strong language in the final letter on the prohibition of cost sharing for vaccines, maintaining the flu measure in the Star Ratings program and the AIS measure on the display page, and continue to closely monitor any effort to limit provider and beneficiary vaccine choice through utilization management tools. We greatly appreciate CMS' continued leadership and partnership in improving coverage and access to this important preventive health benefit.

Please contact an AVAC manager at [info@adultvaccinesnow.org](mailto:info@adultvaccinesnow.org) if you wish to discuss our comments or adult immunization access and coverage.

Sincerely,

Alliance for Aging Research  
American Academy of Family Physicians  
American Pharmacists Association  
American Society of Consultant Pharmacists  
CSL Seqirus  
GlaxoSmithKline  
HealthyWomen  
Hep B United  
Hepatitis B Foundation  
Immunize.org  
Infectious Disease Society of America  
Moderna  
National Viral Hepatitis Roundtable (NVHR)  
Novavax  
STChealth LLC  
Vaccinate Your Family  
Valneva USA