



January 22, 2021

Carol Blackford  
Director  
Hospital and Ambulatory Policy Group  
Centers for Medicare & Medicaid Services  
7500 Security Boulevard  
Baltimore, MD 21244

Dear Director Blackford:

On behalf of members of the Adult Vaccine Access Coalition (AVAC), we write respectfully to request that CMS provide clarifying instruction to the MACs, following the Physician Fee Schedule Update of January 7, 2021, that payment amounts set in the final CY21 MPFS rule for immunization administration services described by HCPCS codes G0008 (Administration of influenza virus vaccine), G0009 (Administration of pneumococcal vaccine), and G0010 (Administration of hepatitis b vaccine) should be increased by 3.75% pursuant to the Consolidated Appropriations Act, 2021 (P.L. 116-260) along with all other CY 2021 MPFS payment rates.

AVAC consists of over 60 organizational leaders in health and public health that are committed to addressing the range of barriers to adult immunization and to raising awareness of the importance of adult immunization. Our organization believes that ensuring that clinicians are properly reimbursed is key to fostering a sustained environment for high-value immunizations. We fully agree with CMS that vaccination services are vital for the health of Medicare beneficiaries, particularly during the ongoing COVID-19 pandemic where health systems are stretched thin, and we believe the MACs, providers, and beneficiaries would benefit from clarification of this supportive payment policy for 2021.

Administering vaccines comes with a number of important responsibilities for providers, including staff training, ordering and tracking vaccine inventory and ancillary supplies for vaccine administration, proper handling, storage and reporting for each vaccine administered, as well as counseling and educating patients and caregivers. Inadequate reimbursement for vaccination administration discourages providers from proactively offering immunizations, and results in missed immunization opportunities and declines in immunization rates. Routine immunizations for Medicare beneficiaries during the ongoing Covid-19 pandemic will require all of these activities on an unprecedented scale all while having to implement new safety measures while vaccinating.

Thank you for your consideration to provide clarifying instruction. We also look forward to working with you and other stakeholders to develop additional information to establish appropriate payment for these

services on a long-term basis. Please be in touch if AVAC can serve as a resource to your office around adult vaccine issues.

Sincerely,

American Academy of Family Physicians  
American Immunization Registry Association  
American Pharmacists Association  
Families Fighting Flu  
GSK  
Hepatitis B Foundation  
Hep B United  
Immunization Action Coalition  
Infectious Diseases Society of America  
Kimberly Coffey Foundation  
Medicago  
Moderna  
National Association of Nutrition and Aging Services Programs  
National Viral Hepatitis Roundtable  
NFID  
Novavax  
Sanofi  
STChealth LLC  
The Gerontological Society of America  
Vaccinate Your Family  
VaxCare

*Cc: Gift Tee, Ryan Howe*