



June 20, 2023

Rochelle P. Walensky, MD, MPH
Director
Centers for Disease Control and Prevention
1600 Clifton Rd, Atlanta, GA 30333

Dear Director Walensky,

We are writing to raise awareness on the need for the publication of real time, comprehensive guidance from the Advisory Committee on Immunization Practice (ACIP) regarding recommendations around recently approved vaccines.

The Affordable Care Act (ACA) requires insurance companies to cover vaccines that have received a recommendation by ACIP that is subsequently approved by the CDC Director. Delays in MMWR publication result in delays in vaccine coverage, and disease and death that could be avoided. Although CDC notes that MMWR publication will be forthcoming on their website, most health insurance companies and health care providers delay coverage and adoption of the new recommendations until the MMWR is released. Assuring timely MMWR publication will result in faster vaccine coverage, provider uptake, and a reduction in vaccine-preventable disease.

Timely guidance to health care providers and plans on recently approved recommended immunizations is extremely important across the lifespan and is exactly what is intended in the CDC's recent initiative [Moving Forward](#). It is especially pertinent for older adults since the immune system deteriorates as people age. Adults 50 years old and over are particularly susceptible to many vaccine-preventable diseases and account for a disproportionate number of deaths and illnesses. Vaccine preventable respiratory illness (influenza, pneumonia, Covid-19, RSV) are a leading cause of sickness and death among older adults. We are encouraged by the robust pipeline of new adult vaccines, including the recent FDA approval of a vaccine for RSV. With these new vaccines on the market, we can collectively work to protect those vulnerable to respiratory disease and prevent serious disability and death by increasing the number of adults who are immunized.

We recognize the important work of ACIP in continuously evaluating and providing detailed clinical recommendations on FDA-approved vaccines. This guidance is instrumental in ensuring that providers, health plans, and patients have a clear understanding of the vaccinations they should receive based on

their age and health status. Once an ACIP recommendation has been made, it is important for health insurance coverage and for rapid provider uptake that it is communicated quickly through the publication of the Morbidity and Mortality Weekly Report (MMWR) by the Centers for Disease Control and Prevention (CDC).

The current CDC process is to publish recommendations on their ACIP Meeting Recommendations website stating “This recommendation has been adopted by the CDC Director and is now official. It will be published in MMWR in the coming months.” However, the ACIP charter indicates that the “recommendations made by the ACIP are reviewed by the CDC Director, and if adopted, are published as official CDC/HHS recommendations in the *MMWR*.” To reduce confusion, CDC should aim to align language across all CDC/ACIP websites including the ACIP homepage, ACIP Meeting Recommendation website, and ACIP charter, to reflect a harmonized policy with regards to when ACIP recommendations are considered official.

Most commercial and Medicare payers have established processes and/or policies that align review and activation of new vaccine coverage and reimbursement to the MMWR publication. So while providers can begin administering a vaccine upon sign-off by the CDC Director, coverage and payment for the administration of those vaccines won’t occur until an MMWR publication of the recommendation. Further, many health care providers, including community pharmacies, also stock vaccines based on MMWR publication. Some larger community pharmacies have policies that do not allow pharmacists to administer vaccinations until MMWR publication. Timely recommendation publication is also critical for seasonal vaccines that have had long-standing recommendations and coverage, such as for influenza, to allow health care providers and stakeholders to adequately plan for the upcoming vaccination effort.

Given the importance of timely review and publication of vaccine recommendations and best practice guidelines following FDA approval, we urge CDC to consider adopting stricter timelines for ACIP recommendations and timelier MMWR publication of recommendations to ensure appropriate patient access. This should include examination of both the time to draft MMWR publications following a vote, and the timelines involved in the clearance and publication process. For example, with the recent approvals of new RSV vaccines, which are anticipated to be recommended by the ACIP next month, timely MMWR publication will be critically important to enable broad coverage and access before the start of the RSV season this Fall and provide time for providers to implement processes for the offering of RSV vaccine.

We appreciate your consideration of this request. We are grateful to the ACIP for its ongoing commitment to ensuring Americans have timely access to the most safe and effective vaccines. If you have any questions or wish to discuss these comments further, please feel free to reach out to an AVAC Manger.

Sincerely,

The AIDS Institute
American Academy of Family Physicians

American Pharmacists Association
Association of Immunization Managers
BIO
CSL Seqirus
Dynavax
The Gerontological Society of America
GSK
HealthyWomen
Hep B United
Hepatitis B Foundation
Immunize.org
Infectious Disease Society of America
March of Dimes
Moderna
National Association of County and City Health Officials
Novavax
Pfizer
Sanofi
STCHealth
Vaccinate Your Family
VaxCare