



National Association of County & City Health Officials

*The National Connection for Local Public Health*

December 3, 2020

Office of Infectious Disease and HIV/AIDS Policy  
Office of the Assistant Secretary for Health  
U.S. Department of Health & Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

Submitted electronically to email: [NVP.RFI@hhs.gov](mailto:NVP.RFI@hhs.gov)

**RE: Request for Information (RFI): Vaccines National Strategic Plan 2021-2025**

On behalf of the National Association of County and City Health Officials (NACCHO), representing nearly 3,000 local health departments across the country, I am pleased to submit comments and feedback on the Office of Infectious Disease and HIV/AIDS Policy (OIDP) Request for Information (RFI) on the Vaccines National Strategic Plan (Vaccine Plan) draft. NACCHO appreciates the opportunity to comment on the RFI and provide a perspective on how local health departments contribute towards the progress in achieving the established goals and objectives.

NACCHO is the voice of the nearly 3,000 local health departments — including city, county, metropolitan, district, and tribal agencies — across the country. According to NACCHO's 2019 Profile of Local Health Departments, 88% of local health departments provide direct clinical immunization services to both adults and children.<sup>1</sup> The draft Vaccine Plan provides a five-year strategic framework for the coordination of vaccine development and implementation with the intent to strengthen vaccine infrastructure and maintain vaccine safety. Building on the 2010 Vaccine Plan, two mid-course reviews of the 2010 plan, and the 2016 National Adult Immunization plan, the draft Vaccine Plan provides a strategy to respond to lessons learned since the publication of these plans and addresses newly emerging and salient issues in immunization related to the coronavirus disease 19 (COVID-19) pandemic. NACCHO commends the 2021-2025 framework's inclusion of five key areas to improve immunization coverage across the lifespan. Overall, NACCHO believes that the draft Vaccine Plan has highlighted goals that appropriately address the vaccine landscape and the associated objectives and strategies will serve as a valuable guide and benchmark for local public health immunization efforts. NACCHO has identified the following priorities, gaps, and recommendations for improvement within the five goals:



- **Goal 1: Foster innovation in vaccine development and related technologies:**

Immunization has been one of the most successful and safest public health measures available to populations worldwide, with an unparalleled record of disease reduction and prevention. Though substantial progress has been made towards reducing and eliminating diseases through vaccination, the presence of newly emerging and ongoing threats continues. NACCHO appreciates the incorporation of strategies that identify and prioritize new and improved vaccines to meet public health needs. This is critical to the work of local health departments that play a vital role in ensuring communities are vaccinated. NACCHO supports innovation in vaccine technology to improve vaccine delivery, storage, distribution, and surveillance for routine and emergency use. The investment in these components is crucial for vaccine delivery, administration, and ensuring we have strong systems in place to maintain high immunization coverage beyond COVID-19 vaccination deployment.
- **Goal 2: Maintain the highest possible levels of vaccine safety:**

Confidence in the safety of vaccines is critical to assuring that vaccines are used as widely, effectively, and appropriately as possible to protect communities across the country. Assuring this safety, from the manufacturing to the administration stages, is a shared responsibility of all levels of public health, the medical community, and the private sector. NACCHO appreciates the inclusion of timely communication to local health authorities related to vaccine safety that is highlighted in Objective 2.2.3. As local health departments administer both childhood and adult vaccination, this is crucial to ensure that coordination and communication occur to ensure safety is a shared responsibility.
- **Goal 3: Increase the knowledge of and confidence in routinely recommended vaccines:**

Vaccine mis- and disinformation is a significant threat to confidence in and uptake of vaccines. Countering vaccine mis- and disinformation and increasing public support for the individual and societal benefits of vaccination requires the inclusion of local health departments. NACCHO recommends the inclusion of local health departments in the implementation of Goal 3 as many local health departments support provider education and public outreach and communication campaigns. Many people report that the advice of their medical provider is key to vaccine acceptance and beliefs. NACCHO therefore commends the prioritization on provider capacity to promote benefits of immunization and strengthen vaccine acceptance. In addition, NACCHO recommends the inclusion of local-level communities in Strategy 3.3.1 to facilitate implementation of evidence-informed strategies to increase vaccine uptake as local communities have great diversity and can speak to unique challenges that would ensure accurate and timely information for decision- and policy-makers. NACCHO also appreciates the inclusion of research in local communities to support the reduction in disparities and inequity in vaccine confidence and acceptance. Finally, NACCHO recommends that Objective 3.3 address

and include details regarding coordination and mobilization of federal agencies and relevant stakeholders to disseminate important communication information to specific audiences.

➤ **Goal 4: Increase access to and use of all routinely recommended vaccines:**

There is an immediate need to implement effective services and strategies to improve health equity in immunization across the lifespan. Available data indicate that socio-economic, geographic, and racial-ethnic disparities and barriers are significant impediments to vaccine access and uptake. Funding for programs designed to make vaccines more accessible to these populations, such as the 317 Program which provides immunizations to un- and underinsured adults, is not adequate to the need in communities which is increasing, as seen for example in recent hepatitis A outbreaks across the country.

NACCHO commends the draft Vaccine Plan's priorities that address social determinants and health inequities that plague many individuals and communities. NACCHO recommends that the plan include strategies to ensure a stable vaccine supply for routine use and emergency preparedness situations. This is critical for public health infrastructure, the ability to respond to outbreaks, and to ensure the safety of the public. NACCHO appreciates that alternative approaches to vaccine service delivery are included with the promotion of public-private partnerships. NACCHO recommends leveraging local health departments to implement Goal 4. Local health departments host immunization clinics in workplaces and schools to ensure access to vaccine for their community. Further broadening community access by including strategies such as 4.1.1 that remove barriers to hosting satellite clinics can support vaccine uptake. In addition, Objectives 4.4 and 4.5 further address access by removing financial and systems barriers on the provider and public side to facility delivery and access to routine vaccinations. NACCHO appreciates the inclusion of Strategy 4.2.2 for state and local health departments to study local immunization disparities and strengthen their community efforts. It is imperative that the Vaccine Plan include the development of a strategy to alleviate access and financial barriers to immunization for all segments of the population.

➤ **Goal 5: Protect the health of the nation by supporting global immunization efforts:**

As demonstrated by the COVID-19 pandemic, there is a need to support vaccine research and development to address vaccine-preventable diseases worldwide. It is incredibly important to improve coordination among global partners in communication, immunization infrastructure and systems. Finally, coordination across federal partners continues to be critical. These efforts should include prioritizing support for vaccine delivery and access and support for global immunization capacity-building efforts.

Overall, NACCHO strongly believes that achieving the goals and objectives outlined in the draft Vaccine Plan will require a multi-disciplinary and collaborative approach among various stakeholders at all levels to implement. As vaccines are considered a significant and effective public health intervention, advancing the goals and priorities of the draft Vaccine Plan will require the efforts of multiple government agencies and stakeholders (including, but not limited to, vaccine manufacturers and researchers, health information technology, pharmaceutical and health insurance partners, maternal-child health and cancer prevention, and organizations/individuals that provide vaccines at the local level).

NACCHO commends the Department of Health and Human Services' (DHHS) efforts to establish a coordinated plan to achieve optimal immunization rates and increase awareness of vaccine-preventable diseases. Thank you for the opportunity to provide feedback on the draft Vaccine Plan and for your consideration of our comments. We look forward to working with DHHS and other immunization stakeholders on implementation of the final plan. For more information, please contact Michelle Cantu, NACCHO's Director for Infectious Disease and Immunization, at [mcantu@naccho.org](mailto:mcantu@naccho.org).

Sincerely,

Lori Tremmel Freeman, MBA  
CEO

---

<sup>i</sup> NACCHO. 2019 Profile of Local Health Departments. Retrieved September 29, 2020 from <https://www.naccho.org/resources/lhd-research/national-profile-of-local-health-departments>.