



National Association of County & City Health Officials

The National Connection for Local Public Health

March 13, 2018

National Committee for Quality Assurance
1100 13th Street, NW, 3rd Floor
Washington, DC 20005

Attention: Draft Document for Healthcare Effectiveness Data and Information Set (HEDIS) Public Comment – Proposed New Measures for HEDIS 2019: Adult Immunization Status and Prenatal Immunization Status

Dear NCQA Advisory Panel and Committee on Performance Measurement,

On behalf of the National Association of County and City Health Officials (NACCHO), I am writing to provide comment on the National Committee for Quality Assurance (NCQA) proposed HEDIS 2019 health plan measure set. NACCHO is the voice for nearly 3,000 local health departments across the country. These city, county, metropolitan, district, and tribal departments work daily to ensure that communities have access to vital public health programs and services such as immunizations. NACCHO appreciates the opportunity to comment and provide a local health department perspective regarding the proposed 2019 immunization measures.

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. Despite the establishment and implementation of immunization recommendations by the Advisory Committee on Immunization Practices, Centers for Disease Control and Prevention, and many other professional organizations, adult and prenatal coverage rates are less than optimal for routinely recommended vaccines, and rates remain below the *Healthy People 2020* targets.^{1,2} Recognizing that HEDIS is a comprehensive set of standardized performance measures used widely across the United States³ to identify, implement, and monitor vaccine improvement opportunities, NACCHO lauds NCQA's efforts to ensure that the HEDIS set includes specific adult and prenatal immunization measures.

NACCHO agrees with the inclusion of the Adult Immunization Status and Prenatal Immunization Status measures in the 2019 HEDIS health plan measure set. NACCHO supports the proposed immunization measures as they provide a platform to maintain and increase immunization coverage among adults and pregnant women, and will serve as a mechanism by which health plans may routinely assess and improve immunization coverage. These HEDIS immunization measures will also provide purchasers and consumers with information regarding access to services and quality of care provided by health plans. NACCHO is encouraged that the inclusion of these quality measurements will also aid in closing gaps in immunization coverage and service delivery.

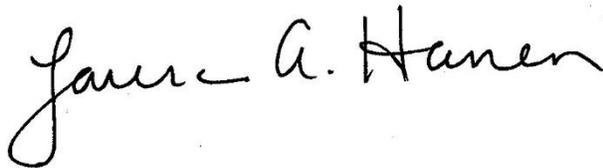
Local health departments across the nation play a vital role in providing immunizations, investigating cases of vaccine-preventable disease, and maintaining high immunization coverage rates. Adult immunizations are the clinical services most often provided by local health departments (90%) across the country, and approximately 27% of local health departments also provide prenatal care services.⁴



Local health departments are uniquely positioned to improve the capacity of the healthcare system for delivering immunizations and strengthening the coordination between public, professional, and private sector stakeholders. Given this, NACCHO champions efforts to establish measures that can be instrumental in helping to achieve optimal immunization rates.

We look forward to further action to refine and implement the proposed measures. If you have any questions, please contact Michelle Cantu, NACCHO Director for Infectious Disease and Immunization, at 202-507-4251 or mcantu@naccho.org.

Sincerely,

A handwritten signature in black ink that reads "Laura A. Hanen". The signature is written in a cursive, flowing style.

Laura A. Hanen, MPP
Interim Executive Director & Chief of Government Affairs

References

1. Centers for Disease Control and Prevention. (2017). Tdap Vaccination Coverage During Pregnancy – Selected Sites, United States, 2006-2015. *Morbidity and Mortality Weekly Report*, 66(41): 1105-1108. Retrieved March 12, 2018, from <https://www.cdc.gov/mmwr/volumes/66/wr/mm6641a3.htm>
2. Centers for Disease Control and Prevention. (2017). Surveillance of Vaccination Coverage Among Adult Populations – United States, 2015. *Morbidity and Mortality Weekly Report*, 66(11): 1-28. Retrieved March 12, 2018 from <https://www.cdc.gov/mmwr/volumes/66/ss/ss6611a1.htm>
3. Centers for Medicare and Medicaid Services. Healthcare Effectiveness Data and Information Set (HEDIS). Retrieved March 12, 2018, from <https://www.cms.gov/Medicare/Health-Plans/SpecialNeedsPlans/SNP-HEDIS.html>
4. National Association of County and City Health Officials. (2017). *2016 National Profile of Local Health Departments*. Retrieved March 12, 2018, from http://nacchoprofilestudy.org/wp-content/uploads/2017/10/ProfileReport_Aug2017_final.pdf