



December 22, 2023

To: Partnership for Quality Measurement (PQM)
From: The Adult Vaccine Access Coalition (AVAC)
RE: Pre-Rulemaking Measure Review public comments

The Adult Vaccine Access Coalition (AVAC) appreciates the opportunity to offer its support for the inclusion of MUC2023-164, the Adult COVID-19 Vaccination Status measure in the 2023 list of Measures Under Consideration (MUC) for inclusion in the upcoming CY2024 Physician Fee Schedule rulemaking process.

AVAC's broad membership consists of over seventy-five 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. Despite the well-known benefits of immunizations, prior the pandemic roughly 50,000 adults died from vaccine-preventable diseases annually, while adult coverage consistently lags for most recommended vaccines.

AVAC works toward common legislative and regulatory solutions that will strengthen and enhance access to adult immunization across the health care system. Our 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. One of our key coalition priorities is to advocate for federal reimbursement, benchmarks, and quality measures to encourage improved uptake and reporting of adult immunization that will result in increased and sustained adult immunization rates.

The devastating economic and personal toll of the COVID-19 pandemic is a stark and painful reminder of the impact of infectious disease on our families, communities, and global societies. AVAC supports CMS' continued leadership in the effort to combat COVID-19 across health care settings caring for Medicare beneficiaries. The proposed adult COVID-19 vaccination status measure builds upon previous CMS rulemakings that have required reporting of COVID-19 vaccination coverage among patients and healthcare personnel (HCP) in certain high risk health care settings. Approving the adult COVID-19 vaccination status measure on the MUC list for further consideration in the CY24 physician fee schedule quality reporting proposed rule would further enhance provider communication with Medicare beneficiaries on this recommended preventive intervention and would provide important information that would improve our understanding of patient utilization of COVID-19 vaccines. AVAC encourages the PQM to closely examine the proposed definition of "up to date" to ensure it is consistent with the official definition on the Centers for Disease Control and Prevention website and also work to align the proposed measure with similar COVID-19 measures across Medicare rulemaking for different health care settings.

This is an important step toward integrating the adult COVID-19 vaccination measure into the Adult Immunization Status (AIS) measure that has been included in the physician fee schedule quality

reporting program. This measure is vital to the health and wellbeing of the community, particularly older adults. Reporting of adult COVID-19 vaccination status would help inform and enhance community infection prevention and control efforts intended to preserve health and mitigate infectious disease outbreaks.

COVID-19 continues to have a disproportionate impact on older adults. We know from the influenza vaccination coverage measure that uptake of the vaccine is associated with provider education and making a strong vaccine recommendation to patients. Consistently assessing adult COVID-19 vaccination status in the clinical setting will encourage continued uptake of the vaccine over the longer term and across providers in different health care settings where Medicare beneficiaries are receiving care.

In closing, thank you again for this opportunity to share our perspective on the adult COVID-19 vaccination status measure on the 2023 MUC list. We are grateful for your work to strengthen and enhance quality improvement measurement tools in the Medicare program. Please contact an AVAC Coalition Manager at info@adultvaccinesnow.org if you wish to further discuss our comments. To learn more about the work of AVAC visit www.adultvaccinesnow.org.