

February 15, 2024

Centers for Medicare & Medicaid Services
Department of Health and Human Services,
7500 Security Boulevard,
Baltimore, MD 21244-1850

Re: PRMR-Final-MUC-Recommendation for MUC2023-164 Adult COVID-19 Vaccination Status

Pfizer is pleased to respond to the Centers for Medicare & Medicaid Services (CMS) request for public comment on the 2023-2024 Pre-Rulemaking Measure Review (PRMR) results and recommendations. Specifically, we write in response to the recommendation of “consensus not reached” for use of the MUC2023-164 Adult COVID-19 Vaccination Status measure in the Merit-based Incentive Payment System (MIPS).

We urge CMS to include in its CY 2025 proposed Medicare Physician Fee Schedule rule the Adult COVID-19 Vaccination Status measure.

Despite the MUC’s vote against including adult COVID-19 vaccination status in MIPS, CMS should nevertheless move forward with its inclusion in the MIPS program. While the prevalence of COVID-19 infections has declined since 2022, COVID-19 remains a source of significant morbidity and mortality, particularly for older adults.¹ Real world evidence shows that vaccination is effective in preventing serious illness, hospitalization, and death from COVID-19. Researchers have attributed the *prevention* of 18.5 million hospitalizations and 3.2 million deaths to COVID-19 vaccines².

Since 2021, the Advisory Committee on Immunization Practices (ACIP) has recommended COVID-19 vaccination for all persons aged 16 and older.³ The ACIP has updated the recommendations over time as new COVID-19 variants have arisen, and as new vaccines have become available. In September 2023, the ACIP recommended vaccination with updated

¹ Use of Updated COVID-19 Vaccines 2023–2024 Formula for Persons Aged ≥6 Months: Recommendations of the Advisory Committee on Immunization Practices — United States, September 2023 *Weekly* / October 20, 2023 / 72(42);1140–1146 <https://www.cdc.gov/mmwr/volumes/72/wr/mm7242e1.htm>

² Fitzpatrick M, Moghadas S, Pandey A, Galvani A. Two years of U.S. COVID-19 vaccines have prevented millions of hospitalizations and deaths, to the point. New York, NY: The Commonwealth Fund; 2022. <https://www.commonwealthfund.org/blog/2022/two-years-covid-vaccines-prevented-millions-deaths-hospitalizations> <https://doi.org/10.26099/whsf-fp90>.

³ COVID-19 ACIP Vaccine Recommendations. <https://www.cdc.gov/vaccines/hcp/acip-recs/vacc-specific/covid-19.html>

vaccines for all persons aged 6 months and older.⁴ Given the importance of COVID-19 vaccination to the Medicare population, CMS should use every tool it has, including quality measures to encourage its uptake.

Measures are an integral part of encouraging vaccine uptake and are used to assess the receipt of vaccines to prevent disease. CMS designated the Adult Immunization Status (AIS) Measure as one of the “Universal Foundation” of measures for tracking quality across programs.⁵ AIS measures the percentage of patients 19 years of age and older who are up to date on recommended routine vaccines for influenza; tetanus and diphtheria (Td) or tetanus, diphtheria and acellular pertussis (Tdap); zoster; and pneumococcal disease. The AIS measure demonstrates the national importance of immunizations. Given that ACIP has recommended COVID-19 vaccination for all adults, it makes sense to adopt the COVID-19 vaccination status measure as a stand-alone now and develop a strategy for including this vaccination in the AIS in the future.

The Committee’s discussion noted concerns about receipt of vaccination in other settings and patient-level factors in vaccine acceptance. These factors are relevant to other vaccines. Polls show that physicians are trusted sources of information on vaccines,⁶ and clinicians should be recognized for their actions to support all relevant immunizations. While affirming the critical role of physicians in promoting immunization across the range of conditions recommended by ACIP, CMS should request additional testing to address the technical considerations raised in this review and support national education efforts to offer Medicare clinicians training and support in working with patients who express vaccine hesitancy.

A COVID-19 vaccination measure for adults in the MIPS program will provide visibility on vaccination receipt and will support efforts to increase vaccination rates among adults and fill an important measurement gap in the program. We urge CMS to propose this measure in the CY 2025 Physician Fee Schedule rule and seek stakeholder comment on its inclusion in the MIPS program.

⁴ Use of Updated COVID-19 Vaccines 2023–2024 Formula for Persons Aged ≥6 Months: Recommendations of the Advisory Committee on Immunization Practices — United States, September 2023 *Weekly* / October 20, 2023 / 72(42);1140–1146 <https://www.cdc.gov/mmwr/volumes/72/wr/mm7242e1.htm>

⁵ Aligning Quality Measures Across CMS - the Universal Foundation <https://www.cms.gov/aligning-quality-measures-across-cms-universal-foundation>

⁶ Liz Hamel, Lunna Lopes, Audrey Kearney, Grace Sparks, Mellisha Stokes, and Mollyann Brodie. KFF COVID-19 Vaccine Monitor: June 2021 <https://www.kff.org/coronavirus-covid-19/poll-finding/kff-covid-19-vaccine-monitor-june-2021/>