

# **DRAFT: Policy Issues Affecting Access to Adult Vaccines: Opportunities to Increase Access and Rates**

2015 National Adult and Influenza Immunization  
Summit

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## **What we will discuss today...**

- **Legislative vehicles**
  - Senator Reed bill
  - House - 21<sup>st</sup> Century Cures Initiative
  - Senate - Innovation for Healthier Americans
- **Overarching policy opportunities**
  - In-network providers
  - Use of IIS
  - Federal funding
  - Quality measures
- **Medicaid and Medicare opportunities**
- **Legislative Next Steps**
- **Adult Vaccine Access Coalition (AVAC)**



## Legislation Under Consideration by U.S. Congress

- Several pieces of legislation on the House and Senate side include provisions that could have a positive impact on adult immunizations
  - Reed bill
  - House initiative: *21<sup>st</sup> Century Cures (21CC)* – second Discussion document and Committee review this week; voting planned for early June
  - Senate initiative: *Innovation for Healthier Americans* just beginning



## Overarching policy opportunities: Adequacy and Breadth of In-Network Providers

- **Policy issue:**
  - Insured persons, especially adults, need to be able to access their vaccines through a variety of healthcare professionals, including pharmacists and public health clinics.
  - Many of these alternate HCPs are not automatically included as “in-network” providers thus causing a financial problem for beneficiaries who may face a co-pay.
- **Actions and Legislative Proposals:**
  - **Provision in Reed bill** - HHS should evaluate healthcare access by geography and demographics to better ascertain actual access to various types of HCPs by age and other criteria
  - **Proposed stakeholder meeting with CCIIO leadership** – letter requesting meeting sent from APhA, ASTHO, IAC, AIM, ACPM and BIO



## Overarching policy opportunities: Use and interoperability of Immunization Information Systems (IIS)

### ■ Policy issue:

- IIS systems represent a unique opportunity to better track immunization status, link to EHR systems that identify those with chronic conditions, prompt busy providers, implement standing orders and reminders, and implement quality measures.

### ■ Actions and Legislative Proposals:

- **21CC Proposal** - CMS and the Office of the National Coordinator (ONC) should be directed to evaluate and report on how EHR standards can be developed to better connect IIS and leverage Meaningful Use projects - not included in revised discussion document
- Plan to share proposal with Senate staff



## Overarching policy opportunities: Funding of state programs focused on uninsured adults and infrastructure

### ■ Policy issue:

- Overall funding of Section 317 has decreased within the CDC budget. In addition, the focus on adult vaccines as part of the program is a relatively new focus for these funds.

### ■ Actions:

- **Appropriations committee** - Stakeholders have been strongly supporting sufficient funding of Section 317 funds, especially where those funds are allocated to assist states in their adult immunization programs and IIS investments



## Overarching policy opportunities: Support development of adult immunization quality measures

### ■ Policy issue:

- There is clear evidence on the impact of quality measures on vaccination rates, but many ACIP-recommended vaccines may not appear in quality metrics.

### ■ Actions:

- **CMS Comment letters** – encourage inclusion of adult immunization measures into Star Ratings for Medicare Advantage-PD and PDP
- **NQF** - Support development of adult immunization measures for the private sector through NQF and other organizations, including adding them to specific chronic disease measures.
- **Medicaid** - Encourage state Medicaid programs to select immunization measures as part of their reporting for the Adult Health Care Quality Measures program.



## Medicaid policy opportunities: Medicaid expansion was not national and may be two-tiered

### ■ Policy issues:

- Adoption of the Medicaid expansion by the states was not uniform thus there are states where many at-risk adults are still without insurance coverage.
- In addition, ACA mandated no cost-sharing for preventive services for the Expansion population but not the Traditional Medicaid populations. Therefore some states may have a two-tiered coverage system.

### ■ Possible actions:

- Encourage state leaders to leverage the 1% FMAP that is included in ACA if they offer the preventive service basket to the Traditional populations at no cost-sharing.



## Medicaid policy opportunities: Provider reimbursement and the expiration of the primary care "bump"

### ■ Policy issue:

- The ACA included an increase in Medicaid Provider admin fees up to Medicare levels for 2013-14 which has now expired.

### ■ Actions and Legislative Proposals:

- **21CC** - Proposal has been made to have the GAO conduct a detailed study of the impact of varying reimbursement rates on access to vaccines for beneficiaries in Medicaid and Medicare – Not in House discussion document, discuss with the Senate.
- **President's 2015 Budget** – Included a proposal to extend the "bump" for 3 more years - Not taken up by the Appropriations or Budget Committees.
- **State activity** - Some states are evaluating the possibility of maintaining the new reimbursement rates for primary care providers
  - Advocates may want to help state decision-makers better evaluate the impact of the "bump" and the possibility of continuing at the new levels



## Medicare policy opportunities: Disparity of coverage between Medicare Part B and Part D

### ■ Policy issue:

- Certain vaccines (influenza, pneumonia and hepatitis B) are included in Medicare Part B coverage with no cost-sharing while all other vaccines (shingles, pertussis, any newly approved vaccines) are or must be included in Medicare Part D coverage

### ■ Actions and Legislative Proposals:

- **21CC** – numerous proposals have been offered to identify ways to improve access to Part D vaccines:
  - Encourage all Medicare Part D plans to put ACIP-recommended vaccines in the lowest co-pay tier
  - Allow Medicare Part D plans and private health plans to include the cost of adult immunization education programs as part of their medical loss ratio (MLR) calculation
  - Require immunization status assessment as part of Medication Therapy Management (MTM) Comprehensive Medication Review
  - Incorporate adult immunization measures into Star Ratings for MA-PD and PDP



## Legislative Next Steps

- Watch the House 21<sup>st</sup> Century Cures process.
- Vaccine stakeholders will meet over next few months and discuss proposals important for vaccines.
- Stakeholders will align, where possible, on agreed proposals and concepts.
- Stakeholders will determine best opportunities to share consensus recommendations and proposals with Senate staff through group meetings.



## Creation of the Adult Vaccine Access Coalition (AVAC)

- The primary objective of the Adult Vaccine Access Coalition (AVAC) is to inform and engage policymakers in working toward common legislative and regulatory solutions that will strengthen and enhance access to adult immunization across the health care system.
- AVAC currently has over 30 members including medical societies, public health organizations, vaccine manufacturers, and organizations focused on specific ethnic and racial groups as well as specific diseases.
- The AVAC priorities and objectives are driven by a consensus process with the goal of enabling the range of stakeholders to have a voice and a stake in the effort to improve access to adult immunizations.



## 2015 AVAC Goals

- Develop Coalition identity, website, and communications strategy that will build the reputation as a trusted and knowledgeable resource inside the Beltway.
- Generate joint documents based on Coalition goals that articulate the importance of vaccines to adults and ways to improve access.
- Coordinate outreach and education opportunities with decision makers in the Administration as well as key staff and members on Capitol Hill.
- Assess, develop and pursue regulatory and policy changes or pilot programs that will promote access to adult vaccines.
- Conduct an assessment of vaccine legislation landscape and map out opportunities to advance Coalition priorities to improve immunization access and reporting.



## Questions?

