

July 7, 2025

Kim Keck  
President and CEO  
Blue Cross Blue Shield Association  
750 9<sup>th</sup> St NW  
Washington, DC 20001

Re: Maintaining Access to Immunizations Without Patient Cost Sharing

Dear Ms. Keck,

On behalf of our nation's more than 800,000 pharmacists, pharmacy faculty, pharmaceutical scientists, student pharmacists, pharmacy technicians, and the patients they serve, we urge you to maintain coverage, without new patient cost-sharing or restrictions, for all currently covered immunizations.

Recent changes to the U.S. Centers for Disease Control and Prevention (CDC) Advisory Committee on Immunization Practices (ACIP) have raised concerns and controversy regarding vaccine access and increased patient cost-sharing for immunizations. However, the science supporting vaccines remains unchanged – they are critical to protecting patients, particularly clinically vulnerable populations such as children, older adults, the medically complex, pregnant women, and immunocompromised individuals, from preventable diseases. Furthermore, we believe decisions about appropriate immunizations should be made by patients and their caregivers with the advice of medical professionals. Should a patient consent to vaccination, we believe coverage should be provided unless there is clear evidence of harm or a high risk of an adverse event.

Immunizations remain one of the most cost-effective<sup>1</sup> and powerful preventive measures available in medicine. As demonstrated by the ongoing measles outbreak, lower vaccination rates contribute to the incidence of vaccine-preventable illness, resulting in increased morbidity and mortality, and pushing up healthcare costs.

Tens of millions of patients trust their pharmacists to administer their immunizations each year. As pharmacists, we see the burden that increased cost-sharing and access restrictions would impose on our patients and their families.

We urge you to protect your policyholders and our patients by maintaining current immunization coverage and access without increased patient cost-sharing and sharing those coverage decisions publicly. We thank you for your consideration and look forward to working with you to care for our patients.

Sincerely,

American Association of Colleges of Pharmacy  
American Association of Psychiatric Pharmacists  
American College of Clinical Pharmacy  
Hematology/Oncology Pharmacy Association  
National Community Pharmacists Association  
National Alliance of State Pharmacy Associations

American Society of Health-System Pharmacists  
American Pharmacists Association  
American Society of Consultant Pharmacists

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<sup>1</sup> See, e.g., F. Zhou et al., "Health and Economic Benefits of Routine Childhood Immunizations in the Era of the Vaccines for Children Program — United States, 1994–2023," CDC Weekly (Aug. 8, 2024), available at <https://www.cdc.gov/mmwr/volumes/73/wr/mm7331a2>; A. Meita Utami et al., "Economic Evaluation of COVID-19 Vaccination: A Systematic Review," J. Glob. Health (Jan. 14, 2023), available at <https://pmc.ncbi.nlm.nih.gov/articles/PMC9838689/pdf/jogh-13-06001.pdf>; A. Leidner et al., "Cost-Effectiveness of Adult Vaccinations