



April 6, 2021

Xavier Becerra
Secretary
Department of Health and Human Services
200 Independence Ave., SW
Washington, D.C. 20201

Jeff Zients
Coordinator of the COVID-19 Response and
Counselor to the President
1600 Pennsylvania Ave., NW
Washington, D.C. 20500

RE: Access to COVID-19 Vaccinations Data

Dear Secretary Becerra and Mr. Zients:

The Alliance of Community Health Plans (ACHP) and Association for Community Affiliated Plans (ACAP) appreciate the thoughtful and inclusive plan the Administration has implemented for disseminating and administering the COVID-19 vaccine. **To fully utilize our community, consumer and provider relationships, we respectfully request that the Administration provide health plans further and complete access to COVID-19 vaccinations data.** ACHP and ACAP plan members have been on the front lines of the pandemic, coordinating care and committing workforce and financial resources to combat this crisis. Our mission to support our member plans' efforts to improve the health and well-being of consumers residing in rural and underserved areas, assisting individuals with significant health care needs and targeting efforts to address the most vulnerable requires timely access to vaccinations information.

ACHP represents the nation's top-performing non-profit health plans improving affordability and outcomes in the health care system. ACHP member companies are provider-aligned health organizations that provide high-quality coverage and care to more than 24 million Americans across 36 states and D.C. They are leading the industry in practical, proven reforms around primary care delivery, value-based payment and data-driven systems improvement.

ACAP is a national trade association representing 78 not-for-profit Safety Net Health Plans. Collectively, ACAP plans serve more than 20 million people through Medicaid, Medicare, the Exchanges, and other publicly-supported coverage programs. Our mission is to support our member plans' efforts to improve the health and well-being of people with low incomes and with significant health care needs.

We are very encouraged by the increasing availability of COVID-19 vaccines and the growing number of vaccinations administered on a daily basis. Recognizing this success, we appreciate the challenges that remain to distribute the vaccine to high-needs population and the critical



need to focus on health equity issues that have become even more evident during this pandemic. ACHP and ACAP plan members have built deep trust with their consumers and communities, a vital asset to efficient and effective vaccine delivery. Our health plans stand ready to ensure that all Americans have simple and informed access to available vaccines and that consumers receive both doses. To be fully effective in our efforts and support the Administration's shot-in-arms effort, it is imperative that the Administration provide complete and comprehensive access to vaccination data.

ACHP and ACAP reaffirm our request that health plans have access to the Center for Disease Control and Prevention's (CDC) Vaccine Administration Management System (VAMS). It is imperative that health plans know which consumers have received a vaccine and those who have not yet to target resources and outreach efforts. Our health plans have engaged wholeheartedly in the vaccine administration effort through member outreach and engagement, provider education and training, facilitating efforts at vaccinating hard-to-reach consumers, and collaborating with state and local public health authorities. However, our efforts continue to be limited by our inability to access the CDC VAMS system which can help health plans find members who have not been vaccinated as well as remind members about the necessary second dose, when appropriate.

In addition, when health plans do have access to state immunization information systems – which we cannot currently access in most states – data are outdated. For example, feeds may only be monthly or quarterly, rather than daily access that would provide timely information. Additionally, these data do not generally include pertinent race or ethnicity information which can help in targeting outreach.

The Administration can play a critical role in encouraging states to share regular and updated data and lead by example in providing health plans access to federal vaccine information. When distributing federal funds provided by the American Rescue Plan Act, the Administration may consider requesting that states provide health plans access to timely and updated vaccination data. The Administration would directly benefit from timely vaccination data as well, specifically as the COVID-19 health equity task force tracks vaccinations across communities and for consumers struggling with health disparities.

As millions of Americans remain hesitant to schedule or receive the vaccine when available to them, it is imperative that health plans with deep-rooted relationships are directly engaging to implement effective strategies along with their providers to help overcome individual consumer concerns. With limited resources, such as personnel for smaller community health plans, it is critical that efforts are directly targeted, and already vaccinated consumers are not unnecessarily contacted. Access to the CDC VAMS system and partnership with state



immunization information systems is an important step to fully and effectively utilizing community health plans to support the shot-in-arms strategy and triumph over this pandemic.

ACHP and ACAP thank the Administration for your consideration and extend our appreciation for your service in facilitating and improving efforts to distribute the vaccine across the country. We welcome additional opportunities to engage to ensure comprehensive and efficient strategies to combat vaccine hesitancy and achieve the Administration's vaccination goals. If you have any questions or need for additional information, please contact:

Michael Bagel
Director of Public Policy
Alliance of Community Health Plans
(202) 897-6121
mbagel@achp.org

Enrique Martinez-Vidal
Vice President, Quality and Operations
Association for Community Affiliated Plans
(202) 204-7527
emartinez-vidal@communityplans.net

Sincerely,

Ceci Connolly, President and CEO
Alliance of Community Health Plans

Meg Murray, CEO
Association for Community Affiliated Plans

Cc: Bechara Choucair, Vaccinators Coordinator, White House
Andy Slavitt, Senior Advisor to the COVID-19 Response Coordinator
Natalie Quillian, Deputy Coordinator of the COVID-19 Response, White House
Cyrus Shahpar, COVID Data Director, White House
Christen Linke-Young, Deputy Director, Domestic Policy Council
Rachel Pryor, Counselor to the Secretary, HHS
Liz Richter, Acting Administrator, CMS
Jeff Wu, Acting Deputy Administrator, CMS
Tim Engelhardt, Director, Medicare-Medicaid Coordination Office