



January 4, 2021

Jeff Zients

Coordinator of the COVID-19 Response and Counselor to the President
Office of President-Elect Biden and Vice-President-Elect Harris

CC: Natalie Quillian, Deputy Coordinator of the COVID-19 Response
Bechara Choucair, Vaccinations Coordinator
Cyrus Shahpar, COVID Data Director
Dr. Marcella Nunez-Smith, COVID-19 Equity Task Force Chair
Sonya Bernstein, COVID Senior Policy Advisor
Osaremen Okolo, COVID Policy Advisor

Re: Health Plan Access to COVID-19 Vaccine Administration Data

Dear Jeff,

Congratulations on your appointment as Coordinator of the COVID-19 Response and Counselor to President-Elect Biden — and welcome back! Your years of public service and leadership in health care will well serve the enormous challenge of responding to the COVID-19 public health crisis.

As you know, the Alliance of Community Health Plans (ACHP) represents the nation's top-performing non-profit and community-based health plans focused on improving affordability and outcomes in the health care system. ACHP member companies are provider-aligned health organizations that deliver high-quality coverage and care to tens of millions of Americans.

ACHP member companies are on the front lines of the COVID-19 pandemic, coordinating care and committing workforce and financial resources to combat this crisis. At the beginning of the pandemic, ACHP members swiftly rose to the challenges created by the virus, prioritizing prevention, testing and treatment. We share the goal of mitigating the virus, helping consumers stay healthy and get better when they fall ill. ACHP members strongly support the COVID Advisory Board's priorities, including the focus on widespread testing, an additional open enrollment period and extending COBRA.

We are encouraged by the availability of COVID-19 vaccines. ACHP members have built deep trust with their members and communities, a vital asset to efficient and effective vaccine delivery. We stand ready to ensure that all Americans have simple and efficient access to available vaccines and that beneficiaries get both of the required doses. Our plans

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commit to provide timely and accurate information on how and when people are able to be vaccinated.

As states and providers ramp-up vaccine administration, we continue to face resistance from federal officials to access vaccination data. In order to be the most effective partners in on the ground vaccination, ACHP CEOs and chief medical officers assert that it is critical that health plan clinical leaders have access to CDC's "data lake" to determine whether a member has received a COVID-19 vaccination, which vaccine they received and when they will need to receive a second dose. Without access, ACHP member companies' only ability to engage in vaccine education and outreach is through public service announcements or generic communications with no insight into which consumers may have already been vaccinated or who has yet to receive a second dose. ACHP members have been on the forefront of advancing health equity, providing a unique opportunity to reach marginalized and overlooked communities and individuals which have borne the brunt of COVID-19 and should be given special attention in educating on the availability and benefit of vaccination.

Contrary to common assertions, billing and claims data are not a sufficient means for tracking vaccinations. Claims are a lagging indicator, and in many instances, it could be weeks or months after a vaccination has been performed that the claim is received. Further, there may be consumers who receive vaccination in public clinics or settings where no claim is sent to the health plan. For a case in point, Medicare fee-for-service will receive all claims data, including for seniors enrolled in Medicare Advantage. Health plan access to the CDC database would address these issues and enable targeted outreach, communication and follow-up with patients through this complex vaccine rollout.

ACHP member companies appreciate the technical and operational accommodations that will be required to allow health plans access to this vaccine data. However, we are certain that our longstanding community and consumer relationships are vital to effective and timely distribution of a vaccine. We appreciate your consideration and prioritizing providing access in the first days of the Biden-Harris Administration. A further delay will only hinder vaccine distribution efforts and further prolong this public health emergency.

We appreciate any opportunities for engagement with you and members of your team to discuss how we can further our shared goals. Please contact Michael Bagel, ACHP Director of Public Policy, at mbagel@achp.org or (202) 897-6121 with any questions.

Sincerely,

A handwritten signature in black ink that reads "Ceci Connolly". The signature is written in a cursive, flowing style.

Ceci Connolly
President and CEO, ACHP