

# United States Senate

August 13, 2020

The Honorable Seema Verma  
Administrator  
Centers for Medicare & Medicaid Services  
Hubert H. Humphrey Building  
200 Independence Ave SW  
Washington, DC 20201

Dear Administrator Verma,

Immunizations are one of the greatest medical advances in human history. Vaccines have essentially eradicated deadly and debilitating conditions, such as measles, chickenpox, polio, that were once commonplace. As the current COVID-19 pandemic rages on around the globe, researchers are racing to find a vaccine to protect and prevent further morbidity and mortality as a result of this novel virus. Older adults and persons with chronic conditions such as heart disease, diabetes and lung disease are especially vulnerable to serious illness and complications from vaccine preventable disease. Yet, Medicare coverage design for vaccines for these populations does not encourage access to this proven and cost-effective form of prevention. We urge the Centers for Medicare and Medicaid Services (CMS) to take action to address this important issue.

As you know, immunization coverage for Medicare beneficiaries is segmented between Medicare Part B, which covers vaccinations against influenza, pneumococcal and hepatitis B for at-risk patients and Medicare Part D, which covers all other commercially available vaccines when deemed medically necessary to prevent illness. While beneficiaries receive Part B-covered vaccines with no cost sharing, Part D vaccines are typically subject to cost sharing requirements. The variable cost sharing requirements discourage immunization among elderly, disabled and chronically ill populations who account for a disproportionate percentage of the morbidity and mortality from vaccine preventable conditions.

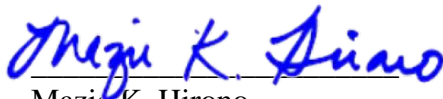
Since 2012, the CMS Annual Call letter to Medicare Advantage and Prescription Drug Plans has brought to light the need to strengthen beneficiary access to Part D vaccines to protect against costly and devastating vaccine preventable conditions. The FY20 call letter stated, “In an effort to improve access to Part D vaccines routinely recommended by the CDC for all adults, or based on age or certain health conditions, we continue to encourage Part D sponsors to either offer a \$0 vaccine tier, or to place these vaccines on a formulary tier with low cost-sharing.”

However, despite clear direction from CMS, few plans have taken advantage of the availability of a \$0 vaccine tier as a means to improve beneficiary vaccination rates. A 2017 report by Avalere Health found between 47 and 72 percent of the 24 million Medicare beneficiaries with Part D coverage had some level of cost sharing for vaccines, ranging from \$35 to \$70 in 2015. Another study found that only 4 percent or less of Medicare Part D enrollees had access to vaccines with no cost sharing. Medicare beneficiaries deserve better access to high

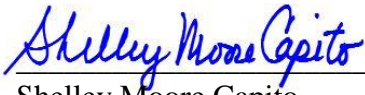
value preventive immunizations than what is presently available under the Part D benefit.

We encourage CMS to work with Part D sponsors to offer either a \$0 vaccine tier, or to place vaccines on a formulary tier with low cost-sharing. Now is the time to empower vulnerable elderly and disabled Medicare beneficiaries with the tools they need to stay healthy and out of the health care system. Immunizations are one of the most reliable and efficient forms of prevention that we know save lives and billions in avoidable health care costs.

Sincerely,



Mazie K. Hirono  
United States Senator



Shelley Moore Capito  
United States Senator



Sheldon Whitehouse  
United States Senator



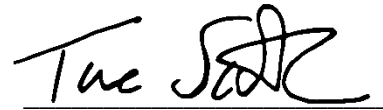
Tim Scott  
United States Senator



Sherrod Brown  
United States Senator



David A. Perdue  
United States Senator



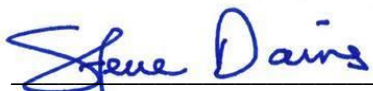
Tina Smith  
United States Senator



Thom Tillis  
United States Senator

/s/ Chris Van Hollen

Chris Van Hollen  
United States Senator



Steve Daines  
United States Senator

/s/ Robert P. Casey, Jr.

Robert P. Casey, Jr.  
United States Senator



Pat Roberts  
United States Senator