

March 29, 2022

[Submitted electronically]

Office of Infectious Disease and HIV/AIDS Policy  
Office of the Assistant Secretary for Health  
U.S. Department of Health & Human Services  
200 Independence Avenue, SW  
Washington, DC 20201  
email: [NVP.RFI@hhs.gov](mailto:NVP.RFI@hhs.gov)

**RE: RFI: Vaccines Federal Implementation Plan 2021-2025**

Dear Dr. Kim,

On behalf of the National Association of County and City Health Officials (NACCHO), representing nearly 3,000 local health departments across the country, I am pleased to submit comments and feedback to the Office of Infectious Disease and HIV/AIDS Policy (OIDP) Request for Information (RFI) on the Vaccines Federal Implementation Plan 2021-2025 (Vaccine Implementation Plan) draft. NACCHO appreciates the opportunity to comment and provide a perspective on how local public health contributes towards the progress in achieving the established goals and objectives.

NACCHO commends the federal strategies and actions that have been included in the Vaccine Implementation Plan to address the goals of the Vaccines National Strategic Plan 2021-2025 and broadening this to focus on vaccine strategies across the lifespan. Overall, NACCHO believes that the draft Vaccine Implementation Plan has highlighted activities that will help to reach the goals set forth and ensure vaccines are more available and equitable for all. We appreciate the inclusion of local health departments in many of the actions, and NACCHO has identified the following recommendations related to goals 3 and 4 that are of particular importance to local health departments.

- **Goal 3: Increase the knowledge of and confidence in routinely recommended vaccines:** NACCHO supports the objectives and actions outlined to address Goal 3 and recommends the inclusion of local health departments throughout these actions, particularly in strategies 3.1.1, 3.2.3, 3.4.1, 3.4.2, and 3.4.5. Activities done with healthcare providers should include LHDs as they often function as safety net providers for vaccines in underserved communities. Data from NACCHO's 2019 Profile shows that



88% of local health departments provide both childhood and adult immunizations, indicating that they are important providers of immunizations in their communities. In addition, local health departments serve as the chief health strategists in their jurisdictions and should be involved in activities to connect with community partners, schools, and others for data collection activities and developing and implementing targeted interventions. According to the NACCHO 2017 Assessment of Local Health Department Immunization Programs, local health departments support outreach and education to local providers, community partners, and parents and youth. Ensuring that local health departments are at the table for the development of outreach activities and evaluation of these activities will be important to understand the range of community needs.

➤ **Goal 4: Increase access to and use of all routinely recommended vaccines:**

As we have seen during the pandemic, there is a great need to ensure there are as many places for people to get vaccinated as possible. Removing barriers and increasing access to vaccines is key to ensuring equity in vaccination. When bringing new vaccination sites on board, they should be linked to their local health department to ensure proper training is provided, both for vaccinators and of vaccination systems, such as a state's IIS system. Ensuring all vaccinators are reporting to their respective IIS system and promoting the practice of viewing IIS records as part of all visits to healthcare providers or pharmacies will help ensure there are no missed opportunities to vaccinate. Additionally, evidence-based, systems-level strategies to increase vaccine uptake, as mentioned in strategy 4.1.2, should be implemented at a population level rather than just at the VA level. Reminder-recall systems have been shown to improve vaccination rates by 5-20%<sup>1</sup>.

NACCHO supports the actions indicated for strategy 4.1.3 to reduce barriers to VFC enrollment. According to the 2017 National Assessment of Local Health Department Immunization Programs, local health departments have expressed barriers to enrollment due to lack of resources to comply with VFC requirements. Assessing the barriers and developing solutions for all vaccine providers would help to increase the number of providers enrolling in the VFC program to ensure those children who are most vulnerable are able to get needed immunizations.

The need for more research and data on racial, ethnic, disability, economic, and other disparities and inequities is vital. In order to adequately assess and meet the needs of these groups, the actions under objective 4.2 are critical. We appreciate the inclusion of

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<sup>1</sup> American Immunization Registry Association. (n.d.). (rep.). Reminder/Recall in Immunization Information Systems. Retrieved March 28, 2022, from [https://repository.immregistries.org/files/resources/5835adc2dc122/mirow\\_reminder\\_recall\\_in\\_iis\\_mini-guide.pdf](https://repository.immregistries.org/files/resources/5835adc2dc122/mirow_reminder_recall_in_iis_mini-guide.pdf).

local health departments in the plans for research and program implementation. We emphasize the need for localized immunization data to be available to better focus on specific populations with low vaccine uptake.

Objectives 4.4 and 4.5, along with the strategies and actions included within will help to ensure all providers are able to administer vaccine to all people. Local health departments have experienced barriers to serving some patients due to public and private insurance restrictions. Working with CMS and other insurance providers to assess barriers and find solutions would ensure local health departments are able to vaccinate all who come to them, both in their office and at mobile, drive-through, and mass vaccination clinics. Additionally, many un- or under-insured adults do not have access to immunizations because of the high costs. Local health departments would like to see a greater investment into the 317 program to ensure all adults have access to needed vaccines.

NACCHO has identified no areas of concern within the Vaccine Implementation Plan and have provided recommendations for clarification of actions where gaps exist. NACCHO commends the Department of Health and Human Services' (DHHS) efforts to establish a coordinated implementation plan to achieve optimal immunization rates and increase awareness of vaccine-preventable diseases. Thank you for the opportunity to provide feedback on the draft Vaccine Implementation Plan and for your consideration of our comments. We look forward to working with DHHS and other immunization stakeholders on implementation of the final plan. For more information or if you have any questions, please contact Adriane Casalotti, NACCHO's chief of government and public affairs, at [acasalotti@naccho.org](mailto:acasalotti@naccho.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Lori Tremmel Freeman". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Lori Tremmel Freeman, MBA  
CEO