



RE: Proposed Changes to Existing Measure for HEDIS: Adult Immunization Status (AIS-E) measure

Members of the Adult Vaccine Access Coalition (AVAC) appreciate the opportunity to share our support for the National Committee for Quality Assurance (NCQA) Proposed Changes to Existing Measure for HEDIS MY 2026: Adult Immunization Status (AIS). The AIS measure includes separate indicators for routine vaccines recommended for adults by the CDC Advisory Committee on Immunization Practices (ACIP), including influenza; tetanus and diphtheria (Td) or tetanus, diphtheria and acellular pertussis (Tdap); zoster; pneumococcal; and hepatitis B immunization. The proposal would add COVID-19 vaccination as a new indicator. Given the low uptake of the vaccine among adult populations, the increased likelihood of serious illness among adults aged 65 and older, and the transition to an annual COVID vaccination recommendation, AVAC supports adoption of this proposed change to the AIS measure. According to the CDC, COVID-19 vaccinations averted 68,000 hospitalizations during the 2023-24 respiratory season.¹

Looking ahead, we urge NCQA to expediate inclusion of additional vaccines that have been recommended for routine use in adult populations, including the RSV vaccine as well as the revised pneumococcal vaccination recommendation for adults age 50 and older. As NCQA advances the use of electronic quality measures across Medicare, Medicaid and commercial plans, closing the gap in time between an ACIP recommendation and inclusion as an indicator in the measure will further enhance our knowledge on vaccine uptake and improve our ability to identify and address potential gaps in vaccine coverage for adult populations.

Thank you again for the opportunity to share our perspective and appreciate your commitment to advancing quality metrics that improve access to preventive health services such as vaccination.

¹ <https://www.cdc.gov/respiratory-viruses/data/vaccination-trends.html>