

August 28, 2020

The Honorable Alex Azar
U.S. Department of Health & Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

Dear Secretary Azar:

On behalf of the American Academy of Pediatrics (AAP) and 44 chapters of the AAP—non-profit organizations representing tens of thousands of pediatricians dedicated to the health, safety, and well-being of all children—we write today alarmed and concerned by the US Department of Health and Human Services' (HHS) decision to allow pharmacists to provide immunizations to children ages 3-18 regardless of state laws. Specifically, HHS recently announced that state-licensed pharmacists and pharmacy interns can administer all Advisory Committee on Immunization Practice (ACIP)-recommended immunizations to children and adolescents. This announcement threatens the medical home, depriving children and families of much needed medical care and clinical guidance, and further exacerbates inequities in the delivery of childhood immunizations.

We do not need an alternative vaccine delivery infrastructure in this country. Instead, we must invest in the existing one, which is centered around the pediatric medical home.

During this pandemic, families are looking for reassurance and clinical guidance from the doctors they trust most to care for their children: pediatricians. The pediatric medical home is where children's medical needs are best met; pediatricians assess children's developmental and mental health, counseling about nutrition and injury-prevention, and chronic disease management in addition to administering vaccines. The pediatric medical home also provides a greater opportunity for parents who may have questions about vaccines to discuss these issues with their pediatrician. AAP and its chapters advocate that immunizations be provided in this context of treating the whole child. The safest place for children to get vaccinated is their medical home.

Pediatric practices are safe, open, and stocked with vaccines, ready to deliver all needed preventive care to our nation's children. We have taken countless steps to encourage children and families to return to pediatric practices for both recommended well-child visits and ACIP-recommended immunizations because children need *both*. Moreover, pediatric practices have worked to ensure that care during the pandemic is provided safely, from offering families different sick/well visit times to administering vaccinations in the parking lot, and many other practice modifications.

The August 19 HHS announcement allowing pharmacists to provide childhood immunizations does nothing to encourage all needed preventive care in the medical home and may in fact deter it. Diseases that go undiagnosed, developmental delays not screened for, child abuse and neglect not identified, and mental health issues not addressed will cost the health of our children and our nation dearly.

Moreover, it will only further exacerbate health inequities children have faced during this pandemic. Few pharmacies participate in the Vaccines for Children (VFC) program, a federal program that provides vaccines at no cost to children who are Medicaid-eligible, uninsured, underinsured, or American Indian or Alaska Native. Data show that the VFC program has increased vaccination rates across all races, ethnicities, and income groups, and reduced racial and ethnic disparities. Now is not the time to further exacerbate existing disparities by creating an alternative vaccine delivery system.

For all of these reasons, we encourage HHS to rescind its August 19 decision and stand ready to work with you to bolster the existing pediatric immunization delivery system: our nation's pediatric practices.

Sincerely,

American Academy of Pediatrics
Alabama Chapter of the American Academy of Pediatrics
Arizona Chapter of the American Academy of Pediatrics
Arkansas Chapter of the American Academy of Pediatrics
California Chapter 1, American Academy of Pediatrics
American Academy of Pediatrics, Colorado Chapter
Connecticut Chapter of the American Academy of Pediatrics
Delaware Chapter of the American Academy of Pediatrics
District of Columbia Chapter of the American Academy of Pediatrics
Florida Chapter of the American Academy of Pediatrics
Georgia Chapter of the American Academy of Pediatrics
American Academy of Pediatrics, Hawaii Chapter
Illinois Chapter of the American Academy of Pediatrics
Indiana Chapter of the American Academy of Pediatrics
Iowa Chapter of the American Academy of Pediatrics
Kansas Chapter of the American Academy of Pediatrics
Louisiana Chapter, American Academy of Pediatrics
Maine Chapter, American Academy of Pediatrics
Maryland Chapter, American Academy of Pediatrics
Michigan Chapter of the American Academy of Pediatrics
Mississippi Chapter of the American Academy of Pediatrics
Missouri Chapter, American Academy of Pediatrics
Montana Chapter of the American Academy of Pediatrics
Nevada Chapter of the American Academy of Pediatrics
New Hampshire Chapter of the American Academy of Pediatrics
New Jersey Chapter, American Academy of Pediatrics
New Mexico Chapter of the American Academy of Pediatrics
New York Chapter 1 of the American Academy of Pediatrics
New York Chapter 2 of the American Academy of Pediatrics
New York Chapter 3 of the American Academy of Pediatrics
North Carolina Pediatric Society, the North Carolina Chapter of the American Academy of Pediatrics
North Dakota Chapter of the American Academy of Pediatrics
Ohio Chapter of the American Academy of Pediatrics
Oklahoma Chapter of the American Academy of Pediatrics
Pennsylvania Chapter of the American Academy of Pediatrics
Puerto Rico Chapter of the American Academy of Pediatrics
American Academy of Pediatrics, Rhode Island Chapter
South Carolina Chapter of the American Academy of Pediatrics
South Dakota Chapter of the American Academy of Pediatrics
Tennessee Chapter of the American Academy of Pediatrics
Texas Pediatric Society, the Texas Chapter of the AAP
American Academy of Pediatrics, Utah Chapter
American Academy of Pediatrics, Vermont Chapter
Virginia Chapter of the American Academy of Pediatrics
West Virginia Chapter of the American Academy of Pediatrics