



November 10, 2008

Lance Rodewald, MD
Director, Immunization Services Division
Centers for Disease Control and Prevention
1600 Clifton Road, NE MS E-52
Atlanta, GA 30333

Dear Dr. Rodewald:

The Association of Immunization Managers (AIM) is writing to express our concern and lack of understanding about recent changes to the Population Estimate Survey (PES) methodology. The impact of such changes on the Vaccines for Children (VFC) program in the states appears to be substantial. We ask that you provide more information on the methodology for PES estimates as they relate to each grantee and that you consider additional analysis and discussion before such changes are made permanent.

Changes to the PES methodology were introduced to grantees in November, 2007 at the annual program managers meeting. At that time, CDC cited overestimation of VFC funds in 2006 and 2007 as the reason for change.

We understand the need for change in determining actual vaccine need when the target VFC funding amount derived from VOFA exceeded actual spending in FY2006 and FY2007 by as much as \$7.5 million. However, estimates in other years, including 2008, have been under actual spending and additional funds have been provided by the Office of Management and Budget (OMB) or borrowed from the next fiscal year in order to maintain vaccine ordering and inventory throughout a calendar year. We believe more time should be spent examining vaccine orders over time in an attempt to better understand the problem before long-term changes are made.

The changes proposed for 2009 will have substantial impact at the immunization program level. In July, 2008, AIM surveyed program managers about the impact of the PES changes. Of 29 grantees responding to a question about impact of the new PES methodology on their VFC award, 24 or 83% reported a decrease in funding and 5 or 17% reported no change. No grantees reported an increase in funding. Twenty-three (23) of 32 grantees, or 72%, reported that they did not accept CDC-provided data and had submitted their own program-specific data. Grantees were spending an enormous amount of time and energy defending their data.

Grantees also raised several specific concerns about the new methodology: the use of out-of-date data, a change in way Medicaid enrollment is calculated, the accuracy of CDC birth cohort information, and what may be a change in the way Alaska Natives and Native Americans are determined.

We agree that PES should be calculated using a standardized approach that reflects the most accurate and up-to-date data. Many state Medicaid agencies have unduplicated Medicaid enrollment data that is more accurate and up-to-date than CMS data. The standard approach should be to verify if state data exists before using CMS data.

CDC has opted to go with the average monthly count for Medicaid enrollment rather than the annual unduplicated enrollment figure. We believe that the average monthly count does not effectively consider the “churn rate” in Medicaid and underestimates the number of Medicaid enrollees at any point in time. This is especially important in estimating the number of infants in the program.

Some grantees reported to AIM that CDC data on the birth cohort in their state or area was inaccurate. It is critically important that all infants be counted, including those born out-of-state to residents who cross state lines for childbirth.

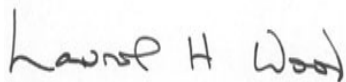
With regard to Alaska Natives and Native Americans, it is unclear to us what methodology or data sources were used to calculate the population for these groups.

Finally, grantees expressed concern about the lack of ability to document underinsured populations and “undocumented” populations. Yet these populations play a critical role in their efforts to keep immunization coverage rates as high as possible.

The upcoming Program Managers meeting in New Orleans provides an opportunity for discussion of the changes to the PES and their impact on grantees. The bottom line for both grantees and CDC is that we make sure there is enough vaccine for all VFC children. We encourage you to address this in your remarks and to participate in further discussion with the AIM Finance Committee during the in-person Committee meeting on Wednesday, November 19.

Thank you for your consideration. Please contact David Lynch, Chair of the AIM Finance Committee or Claire Hannan for additional information.

Sincerely,

A handwritten signature in black ink that reads "Laurel H Wood". The signature is written in a cursive, slightly slanted style.

Laurel Wood, MPA
Chair

cc: Claire Hannan, Executive Director
David Lynch (NY), AIM Finance Committee Chair