



## Association of Immunization Managers (AIM) Public Comment

### NCQA Adult Immunization Status (AIS-E) Measure

March 11, 2022

The Association of Immunization managers (AIM) appreciates the opportunity to comment on the National Committee for Quality Assurance (NCQA) Proposed Changes to Existing Measure for HEDIS MY 2023, Adult Immunization Status, and the Proposed Measure Retirement of the CAHPS Health Plan Survey Method for the FVA, FVO, and PNU. AIM represents the 64 state, territorial, and large urban area public health immunization programs.

AIM is appreciative of the timely work NCQA has conducted to ensure the Adult Immunization Status Measure (AIS-E) reflects the new 2022 CDC's Advisory Committee on Immunization Practices (ACIP) pneumococcal recommendation for the 20-valent (PCV20) and the 15-valent (PCV15) for adults 65+. We believe that aligning immunization status measures with all recommendations from CDC's ACIP demonstrates ongoing commitment to the principles of safety, consistency, efficiency, and transparency. The pneumococcal measure should include the 18-64 age group for PCV20 and PCV15 eligible adults with underlying conditions and any other changes to align with ACIP recommendations.

Secondly, AIM supports the retirement of the Consumer Assessment of Health Providers Systems (CAHPS®) Health Plan Survey method. Information collected through the Consumer Assessment of Healthcare Providers and Systems method has proven limited capability to accurately collect or reflect the sequencing or other nuances of the updated ACIP recommendations. We believe that focusing on AIS-E will ensure a path to more accurate data and data collection. AIM supports adding the proposed composite age stratifications to measure performance among members younger than 65, 65 and older, and all ages combined.

AIM would also like to advocate for capturing race and ethnicity data for all individuals included in the numerator for the pneumococcal and the adult composite measure to clearly identify racial and ethnic disparities in vaccination coverage. Immunization data at the local level continues to show racial and ethnic disparities in vaccination coverage. Capturing race and ethnicity will allow for identification of racial and ethnic disparities in vaccination and, ultimately, improve jurisdictions' abilities to develop and implement equitable vaccination programs. Furthermore, AIM advocates for capturing sexual orientation and gender identity (SOGI) information for all individuals included in this numerator to identify disparities in vaccination coverage.



Association of  
Immunization  
Managers

We admire NCQA's continued efforts to positively impact adult immunization coverage rates and continued commitment to scientific research, data reporting, and immunization quality and coverage. For questions or comments, contact Claire Hannan, AIM Executive Director, at [channan@immunizationmanagers.org](mailto:channan@immunizationmanagers.org).

Thank you for your time and consideration,

A handwritten signature in cursive script that reads "Claire Hannan".

Claire Hannan

Executive Director, Association of Immunization Managers