



Alaska Senate Health and Social Services Committee
State Capitol
120 4th Street
Juneau, AK 99801

February 21, 2014

Dear Alaska Senate Health and Social Services Committee,

I am writing today on behalf of the Biotechnology Industry Organization (BIO), a national trade organization representing more than 1,100 biotechnology companies, academic institutions, state biotechnology centers, and related organizations across the United States. Our members are involved in the research and development of healthcare, agricultural, industrial, and environmental biotechnology products. BIO membership includes vaccine developers and manufacturers who have worked closely with the public health community to support policies that help ensure access to innovative and life-saving vaccines for all individuals.

BIO opposes Senate Bill (S.B.) 169. While we recognize and share the State's goals of increasing the administrative ease of vaccine administration and achieving high vaccination rates, we believe the proposed program would result in an additional administrative burden for the State, create redundancy relative to the Affordable Care Act (ACA) and have very little impact on immunization rates among Alaskans.

The ACA requires insurance plans to now cover key preventive services, including immunizations recommended by the Centers for Disease Control and Prevention's (CDC's) Advisory Committee on Immunization Practices (ACIP), with zero cost-sharing for patients per section 2713 of the Public Health Service Act.¹ This requirement will go into full effect this year, meaning a universal purchase program financed through vaccine assessments on insurers, such as that proposed by S.B. 169, is unnecessary.

S.B. 169 would also create an additional administrative burden on the Alaska Department of Health and Social Services with administrative costs for managing the state's vaccine supply. It is also important to note that a universal purchase program does not negate the need for providers to maintain and track vaccine by funding source. Vaccines purchased for the Vaccines for Children (VFC) program still can only be given to VFC-eligible children and providers need to maintain storage and tracking systems to ensure that. The addition of a State Vaccine Assessment Commission, the hiring of relevant staff, and the development of the assessment rate and necessary yearly updates all require additional funds and capital investment. We recommend that if these funds are available, they be used to identify alternative solutions to increase vaccine access and vaccination rates. We would be pleased to assist in these efforts.

¹ 42 U.S.C. §§ 300gg-13.



We are concerned also that universal purchase programs such as that outlined in S.B. 169 have not been shown to consistently increase immunization rates. In 2012, according to data from the CDC's National Immunization Survey (NIS), only three of the top ten states for coverage rates among children 19-35 months of age for selected vaccines had a universal purchase policy, while another three universal purchase states ranked in the bottom ten. Additionally, CDC researched the seven most improved vaccination programs from 2001 to 2004 to determine the cause for improved coverage rates and none cited universal funding or the ability to provide free vaccines for all children as a reason. Instead, the CDC found these programs improved because of leadership and commitment; relationships with partners; an understanding of local attitudes and beliefs; increased provider awareness campaigns; collection and use of data; a devoted staff; and high visibility for immunization in leadership, the environment, and with partners.

BIO opposes Alaska Senate Bill 169 but we share your goal of increasing vaccine access and immunization rates among Alaskans. We stand ready to help in any discussion of alternatives as well as to share our knowledge of activities and initiatives from around the country. Please feel free to contact me with any questions you may have.

With sincerest regards,

A handwritten signature in black ink, reading "Phyllis A. Arthur", is positioned below the text "With sincerest regards,".

Phyllis A. Arthur
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