BCBSA PRINCIPLES: COVID-19 VACCINE
SUPPORTING A SAFE, EFFECTIVE AND AFFORDABLE VACCINE

A safe, effective and affordable vaccine – that has the public’s trust – is a key component to overcoming the COVID-19 pandemic. Like past vaccines, it is critical that any Food and Drug Administration (FDA) approval or authorization of vaccines be based on sound, scientific evidence to prove its safety and efficacy. There also must be open and transparent processes for vaccine development, allocation and distribution to generate public support and trust.

Blue Cross and Blue Shield (BCBS) companies (Blues®) support a scientifically based COVID-19 vaccination effort guided by the following principles to achieve widespread immunization of the public and mitigate the harms of the pandemic.

Coverage of the Vaccine

BCBS companies will do their part in covering the cost of vaccination with no cost-sharing to members, in accordance with federal laws and regulations. The Blues will encourage immunizations in line with Advisory Committee on Immunization Practices (ACIP) recommendations as quickly as possible, once the FDA approves or authorizes a vaccine for use. BCBS companies will follow the lead of the FDA, Centers for Disease Control and Prevention (CDC) and other scientific experts in disseminating evidence-based and actionable information to members. Even now, BCBS companies are updating flu vaccine outreach strategies due to the pandemic – to engage members directly and/or seek out new community partners – to increase flu vaccination rates and reduce burden on the health care system.

Trust through Transparency

There should be open and transparent processes for the vaccines’ authorization, approval, allocation and distribution. BCBS companies will be examining criteria to ensure that federal agencies and independent advisory groups are adherent to their own critical scientific standards for a safe and effective vaccine. These standards also include transparency from the FDA and manufacturers on vaccine products’ clinical data.

If multiple vaccines are available, we call for comparative, evidence-based guidance on recommended uses that are complete and understandable to public health officials, providers and the public. Transparent processes and consistent messaging that demonstrate a reliance on scientific evidence will generate public support and trust in a safe and effective vaccine once approved or authorized by the FDA.

Affordable Pricing

The federal government has financed the development, clinical trials and mass production of vaccine candidates. Vaccine pricing should be affordable and reflect the taxpayer investment of the Operation Warp Speed public-private partnership. The federal government should ensure manufacturers are establishing affordable vaccine prices if and when the government is no longer the sole purchaser of COVID-19 vaccines. In addition, the federal government should ensure reasonable vaccine administration fees for providers and allocate resources to cover the under- and uninsured populations.

Surveillance for Safety and Efficacy

Given the unprecedented nature of this pandemic and the speed at which science is racing to catch up, there should be robust post-market monitoring and oversight of any products which are authorized or approved. We recommend the federal government build out real-time mechanisms to evaluate post-market data and disseminate findings to the public including key vaccination metrics. Additionally, the federal government should follow National Academies of Sciences, Engineering, and Medicine’s (NASEM) recommendations to fund adequately the Countermeasures Injury Compensation Program for patients with confirmed serious adverse
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Effects from a specific COVID-19 vaccine. This will not only support the safety of the American people, but also be critical for retaining trust in the vaccines as they become available to more of the population.

Purposeful Prioritization
BCBSA supports broad and equitable allocation and distribution strategies that prioritize those most at risk for contracting COVID-19, including front-line workers (e.g., health care personnel), the elderly, people of color and other vulnerable populations. These groups should be prioritized in obtaining the vaccine to reduce morbidity, mortality and racial and ethnic disparities in distribution and access. We support policies that encourage patient access to vaccines at appropriate sites of care, including pharmacies, when aligned with standards established by the FDA, ACIP and other federal agencies.

Finally, the Administration should give clear and consistent recommendations to states and providers for allocating and distributing a vaccine in alignment with CDC recommendations. This includes providing important logistical and storage requirements of a vaccine and underscoring adherence to distribution guidelines. This will ensure consistent standards across states for distributing to priority groups.

Addressing Racial and Ethnic Disparities
BCBSA supports prioritizing access to a vaccine to reduce racial and ethnic disparities. In comments to NASEM, we supported the inclusion of equity as a crosscutting consideration for the phased allocation recommendations as well as NASEM’s goal to decrease racial and ethnic health disparities. People of color, who the pandemic has disproportionately affected, are a higher proportion of certain priority target groups. To ensure further that the COVID-19 vaccine is affordable and available in underserved communities, which disproportionally consist of communities of color, there should be free access for the insured and uninsured.

Communication Campaign
BCBSA supports federal and state public communication and outreach efforts to build public trust and address vaccine hesitancy. Public health vaccination efforts have been successful in improving the health of America with the eradication or near-elimination of smallpox, polio, measles, diphtheria, and whooping cough. Yet, a vaccine that never leaves the vial helps no one. A communication campaign should build on successes in the past and rely upon open and transparent COVID-19 vaccine processes to address the public’s growing vaccine hesitancy. An effective communications campaign that accounts for the current environment and different populations’ perspectives is imperative to make an available vaccine successful. Such a campaign would serve to:

1) Address barriers to immunization (e.g., dispel myths, address patient concerns) to support uptake when a safe and effective vaccine is made available
2) Educate physicians and community groups on the clinical efficacy and safety data of a vaccine to combat vaccine hesitancy
3) Support proactive adherence efforts (e.g., encouraging annual flu vaccination) to reduce burden on the health care system
4) Instill the value of vaccines in improving the health of America