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January 12, 2026

House Committee on Human Services  
Vermont State House  
115 State Street  
Montpelier, VT 05633-5301

**Re: Comments on H.545 – An act relating to issuing immunization recommendations**

Dear Committee Members,

I write on behalf of MVP Health Care to provide comments on H.545 – An act relating to issuing immunization recommendations. MVP is a regional, not-for-profit community health plan that currently covers approximately 40,000 Vermonters enrolled in the fully insured individual and employer group markets.

**Support for H.545 and Vermont's Evidence-Based Approach**

MVP supports H.545. The bill aligns with—and we share—the State's perspective to continue providing patient access to immunizations grounded in clinical, evidence-based standards and delivered without member cost-sharing. The bill's provisions that (1) reaffirm no-cost coverage of Commissioner-recommended immunizations and (2) clarify state authority to issue recommendations and standing orders will help sustain consistent access and operational clarity across plans and providers.

MVP currently covers both the vaccine and vaccine administration in accordance with Vermont's existing requirements, including the Vermont Vaccine Purchasing Program (VVPP) operated by the Department of Health, and applicable insurance coverage mandates. In that spirit, we support maintaining and clarifying these requirements to ensure patients continue to access vaccinations without financial barriers.

**Public Health Rationale for No-Cost Vaccine Coverage**

Maintaining clear, no-cost coverage is essential to:

- Increase uptake and equity by eliminating financial barriers for adults and children.
- Ensure statewide access and lower system costs through centralized procurement and distribution
- Support providers with standing orders and liability protections, enabling efficient delivery and reducing administrative friction.

**Closing**

MVP appreciates the Committee's work on H.545 and is available to provide further detail or answer additional questions.

Thank you for your consideration.

A handwritten signature in blue ink that reads "Jordan T. Estey".

Sincerely,  
Jordan Estey  
Vice President, Government Affairs  
MVP Health Care