



An Independent Licensee of the Blue Cross and Blue Shield Association.

January 13, 2026

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

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

Dear Members of the Committee,

I am here to testify on behalf of Blue Cross and Blue Shield of Vermont to provide support and comments on H.545 – an act relating to issuing immunization recommendations. As Vermont's only local, non-profit health plan, we're driven by our mission to make health care work better for all Vermonters and to the coverage we provide to nearly 200,000 neighbors through the health insurance marketplace.

Support for H.545's policy objectives

Blue Cross and Blue Shield of Vermont supports the policy objectives of H.545. We are aligned with the State's approach to providing recommended immunizations using evidence-based and clinical standards that can be provided to our neighbors without cost-sharing.

Specifically, we support the continuation of providing universal access to immunizations at no cost to our members. Blue Cross and Blue Shield of Vermont currently provides for vaccines and their administration in accordance with Vermont law and participation in the Department of Health's Vermont Vaccine Purchasing Program (VVPP). Accordingly, we support authorizing State-level immunization recommendations to help sustain access to immunizations that Vermonters have come to expect from providers and plans alike.

Concerns raised by H.545

While Blue Cross and Blue Shield of Vermont supports the policy objectives of H.545, the bill raises some important concerns that should be addressed before it is enacted:

- Differences between a Vermont vaccine schedule and a federal vaccine schedule may affect the eligibility, and the price, of the vaccines purchased through the VVPP. Although we think the risk is low, we would like to assure that the cost of vaccines VVPP would purchase through another vendor would not exceed the cost of privately purchased vaccines for which we reimburse.
- The change to provide universal access to immunizations at no charge from "all Vermonters" to "individuals domiciled in the State" may unintentionally exclude some Blue Cross members who live in border states and utilize Vermont providers.
- Any conflicts of interest should be disclosed and avoided by members of the Vermont Immunization Advisory Council.



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Conclusion

Blue Cross and Blue Shield of Vermont supports the policy objectives of H.545 but has concerns about (i) unintended price increases for immunizations that may be recommended by the State, but not eligible for purchase through the CDC ; (ii) unintentionally shrinking the pool of individuals who can access immunizations; and (iii) disclosing and avoiding conflicts of interest by members of the Vermont Immunization Advisory Council.

As always, Blue Cross and Blue Shield of Vermont stands as a ready partner to help make H.545 a reality that best serves Vermonters. Thank you for your time and consideration.

Sincerely,

Nancy Hogue, PharmD
Director of Pharmacy
Blue Cross and Blue Shield of Vermont