



**RE: Proposed Changes to Existing Measure for HEDIS 2017: Pneumococcal Vaccination Status for Older Adults (PNU)**

As participants in the Adult Vaccine Access Coalition (AVAC), we appreciate the opportunity to comment on the National Committee for Quality Assurance (NCQA) proposed modifications to the Pneumococcal Vaccination for Older Adults measure.

AVAC consists of over 45 organizational leaders in health and public health that are committed to tackling the range of barriers to adult immunization and to raising awareness of the importance of adult immunization. AVAC works towards common legislative and regulatory solutions that will strengthen and enhance access to adult immunization across the health care system. Our mission is informed by a growing body of scientific and empirical evidence in support of the benefits immunizations provide by improving health, protecting lives against a variety of debilitating and potentially deadly conditions and saving costs to the healthcare system and to society as a whole.

AVAC priorities and objectives are driven by a consensus process with the goal of enabling the range of stakeholders to have a voice in the effort to improve access and utilization of adult immunizations. One of our key coalition priorities is to advocate for federal benchmarks and quality measures to encourage more comprehensive tracking and reporting of immunization status that will result in increased adult immunization rates.

We support NCQA's proposed modification of the "Pneumococcal Vaccination for Older Adults" measure collected through the Medicare Consumer Assessment of Healthcare Providers and Systems (CAHPS®).

The current question asks: *"Have you ever had a pneumonia shot? This shot is usually given only once for twice in a person's lifetime and is different from the flu shot. It is also called the pneumococcal vaccine."*

We believe the suggested changes below will help to bring the patient survey question closer in line with current pneumococcal immunization recommendations by Advisory Committee for Immunization Practice (ACIP) for adults age 65 and older.

*"Have you ever had one or more pneumonia shots? Two shots are usually given in a person's lifetime and these are different from a flu shot. It is also called the pneumococcal vaccine."*

While the question does not specify PCV13 and PPSV23, the order in which patients should be vaccinated, or the amount of time between which the two immunizations should initially occur, we believe this interim step will help provide better information in terms of whether or not adults age 65 and older are being properly immunized against pneumonia.

Last year, the Health and Well-Being Committee for the National Quality Forum (NQF) proposed standards specifications for pneumococcal measures in order to better align measures across healthcare settings and to bring measures in accordance with ACIP recommendations.<sup>1</sup> AVAC encourages NCQA to continue to work with CMS to update, further refine and streamline pneumococcal vaccination-related quality measures.

We are grateful to NCQA for taking this intervening action in light of the significant toll pneumonia takes in terms of lives and health care costs, particularly among our elderly population. We look forward to further action to clarify and refine the collection of quality measure data on pneumococcal immunization coverage. Please contact an AVAC manager at [\(202\) 540-1070](tel:2025401070) or [info@adultvaccinesnow.org](mailto:info@adultvaccinesnow.org) if you wish to discuss our comments or adult immunization.

Alliance for Aging Research  
American College of Preventive Medicine  
Asian and Pacific Islander American Health Forum  
Immunization Action Coalition  
National Association of City and County Health Officials  
Takeda Vaccines  
The Gerontological Society of America

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<sup>1</sup> <http://www.qualityforum.org/ProjectMaterials.aspx?projectID=77856>