



January 17, 2021

Director Nick Macchione, FACHE  
Health & Human Services Agency  
County of San Diego  
1600 Pacific Highway, Room 206, MS-P501  
San Diego, CA 92101

Submitted via email: [nick.macchione@sdcounty.ca.gov](mailto:nick.macchione@sdcounty.ca.gov)

RE: Urging Immediate HHS Action to Remove Barrier to Citizens of San Diego County for Timely Access to COVID-19 Vaccines During this Crisis

Dear Director Macchione:

The National Association of Chain Drug Stores (NACDS) and the California Retailers Association (CRA) offer our appreciation for the leadership of the Health and Human Services Agency (HHS) for the County of San Diego during our nation's response to this unprecedented crisis. Since the emergence of COVID-19 in the U.S., chain pharmacies and their staff have served in critical roles as part of the nation's pandemic response. We are reaching out to urge you to immediately remove the requirement that pharmacies enrolling as vaccine providers in the county meet the Vaccines for Children (VFC) Program requirements. Pharmacies are already required to adhere to vaccine storage and handling requirements set forth within the Centers for Disease Control and Prevention (CDC) COVID-19 provider agreement, which was created with patient safety in mind. Thus, San Diego's additional local requirement outside of the CDC's requirements creates an administrative barrier that does not appear to improve patient safety. Further, to date children are not even included in COVID-19 vaccination prioritization discussions, so this requirement seems further misplaced.

The VFC Program was developed in the 1990's with pediatrician's offices in mind, and as such, there are significant operational and implementation barriers that make participation in this program extremely difficult for retail pharmacies. To date, many chain pharmacies are not enrolled in this program, not due to a lack of interest to participate, but instead due to several challenges that have been raised with the CDC for several years. Chain pharmacies are strongly committed to working with San Diego County to vaccinate its community, yet the VFC requirement is unnecessarily preventing their full participation.

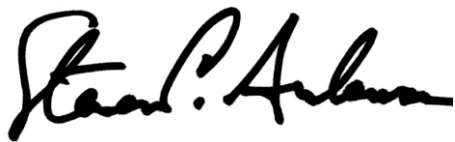
We urge you to remove this requirement. It should be noted that the Centers for Medicare and Medicaid (CMS) has stated that administration of a VFC-covered vaccine for Medicaid-eligible children would be provided by the state Medicaid program. With this in mind, please note pharmacies in San Diego have the ability to bill for vaccines administered to Medicaid-eligible children without enrolling in the VFC program.

Thank you for your consideration of this request. Please do not hesitate to contact Jennifer Snyder or Lindsay Gullahorn with Capitol Advocacy at [jsnyder@capitoladvocacy.com](mailto:jsnyder@capitoladvocacy.com) or [lgullahorn@capitoladvocacy.com](mailto:lgullahorn@capitoladvocacy.com) to discuss further.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rachel Michelin".

Rachel Michelin  
President  
California Retailers Association

A handwritten signature in black ink, appearing to read "Steve C. Anderson".

Steve C. Anderson, FASAE, CAE, IOM  
President & Chief Executive Officer  
National Association of Chain Drug Stores