



NATIONAL ASSOCIATION OF  
CHAIN DRUG STORES

June 14, 2024

Shelley Bailey  
Chair  
Oregon Prescription Drug Affordability Board  
350 Winter St. NE, Room 410  
Salem, OR 97309

Submitted via [pdab@dcbs.oregon.gov](mailto:pdab@dcbs.oregon.gov)

**Re: Vaccine Eligibility**

Dear Chair Bailey,

On behalf of our members operating in Oregon, the National Association of Chain Drug Stores (NACDS) is writing to comment on the Prescription Drug Affordability Board's June 26<sup>th</sup> meeting regarding the affordability review of Shingrix. We are concerned with the inclusion of vaccines in PDAB affordability reviews.

**Vaccine Eligibility for PDAB Review**

Community pharmacies provide many vital preventive services, including administering vaccines. To date, over 307 million COVID-19 vaccinations alone have been provided by pharmacies.<sup>1</sup> NACDS strongly believes that vaccines should not be subject to affordability review. Vaccines currently undergo a cost effectiveness and economic value assessment process through the CDC's Advisory Committee on Immunization Practices (ACIP) after FDA approval. They are reviewed and recommended by the ACIP before they can be accessed by the public or covered by public and private insurance. Both the Affordable Care Act and the Inflation Reduction Act mandate that all CDC-recommended vaccines are covered without cost-sharing for all publicly and privately insured individuals. For patients, this means that out-of-pocket costs are largely nonexistent. Additionally, federal safety net programs provide access to vaccines without cost-sharing for uninsured and underinsured individuals.

Finally, high utilization of vaccines and preventing associated medical costs is the goal of the Oregon Immunization Program and helps address healthcare inequities. Vaccines should not be subject to an affordability review based on high or increasing utilization, as this conflicts with public health goals to increase immunization rates as an important prevention tool.

NACDS appreciates the board's endeavors to reduce prescription drug costs and enhance affordability for Oregonians. However, we strongly encourage removing vaccines as eligible for

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<sup>1</sup> <https://www.cdc.gov/vaccines/covid-19/vaccination-provider-support.html#closing-out>

review by the board based on the above rationale to help ensure continuity of care in Oregon. For questions or further discussion, please get in touch with Sandra Guckian, Vice President of State Pharmacy and Advocacy, at [SGuckian@nacds.org](mailto:SGuckian@nacds.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Steven C. Anderson". The signature is fluid and cursive, with a long horizontal stroke at the end.

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

cc: Oregon Prescription Drug Affordability Board Members

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NACDS represents traditional drug stores, supermarkets and mass merchants with pharmacies. Chains operate over 40,000 pharmacies, and NACDS' member companies include regional chains, with a minimum of four stores, and national companies. Chains employ nearly 3 million individuals, including 155,000 pharmacists. They fill over 3 billion prescriptions yearly, and help patients use medicines correctly and safely, while offering innovative services that improve patient health and healthcare affordability. NACDS members also include more than 900 supplier partners and over 70 international members representing 21 countries. Please visit [NACDS.org](http://NACDS.org).