



October 3, 2023

Robbie Goldstein, MD, PhD  
Commissioner of the Massachusetts Department of Public Health  
Massachusetts Department of Public Health  
250 Washington Street  
Boston, MA 02108

Commissioner Goldstein,

For over a decade, Massachusetts has had an established precedent of supporting provider choice for vaccines through its state-supplied vaccine program. A decision at the Massachusetts Vaccine Purchasing Advisory Council on September 14 unexpectedly deviated from this precedent by limiting supply to only one pneumococcal conjugate vaccine (PCV), in contrast to the recommendation from the Advisory Committee on Immunization Practices (ACIP) and Massachusetts' historical commitment to provider choice. **We write to strongly urge you to maintain choice for all vaccines in the vaccine program in alignment with ACIP recommendations.**

MassBio represents the premier global life sciences and healthcare hub of Massachusetts, which has a vibrant biomedical research and development community that is a global leader for medical discovery and innovation. MassBio's 1,600+ member organizations are dedicated to preventing, treating, and curing diseases through transformative science and technology that brings value and hope to patients. MassBio's mission is to advance Massachusetts' leadership in the life sciences to grow the industry, add value to the healthcare system, and improve patient lives.

The Biotechnology Innovation Organization (BIO) is the world's largest trade association representing biotechnology companies, academic institutions, state biotechnology centers and related organizations across the United States and in more than thirty other nations.

Supporting provider choice keeps science in the driver's seat on decisions related to vaccine access, reinforces the Advisory Committee on Immunization Practices' (ACIP) rigorous data evaluation processes, and ensures that providers have the opportunity to make the best choice for their patients and the communities they serve. Healthcare providers are the medical experts for their patients and are best suited to make an informed decision on which vaccine brand to choose for their patients, leveraging their medical training and the unique needs of each patient. This is especially important because different vaccines may have differing efficacy, safety and utilization profiles for specific patients.



The policies of the Centers for Disease Control and Prevention (CDC) support provider choice as does the intent of the Vaccines for Children (VFC) program. Recognizing the benefits of choice, the CDC has developed vaccine procurement policies designed to facilitate choice. The annually negotiated CDC contract allows access to **all** vaccine brands, and grantees can select VFC vaccines without restriction. The ACIP also encourages all grantees to offer choice of vaccine brands to providers.

Provider choice facilitates a robust and resilient vaccine supply. Provider choice stabilizes the vaccine supply, encourages innovation, and offers some protection against the impact of supply shortages. In this light, limiting provider choice for vaccines can have unintended consequences. For example, purchasing vaccines from more than one source can help avoid vaccine shortages. In addition, as new products and ACIP recommendations are re-evaluated, allowing choice means that flexibility is built into the system to bring the complex ordering, distribution, registry, and billing systems online that must be updated.

Again, we strongly urge you to revisit this decision and reaffirm Massachusetts' commitment to provider choice. We would be happy to meet with you and discuss our concerns about this issue at any time.

Sincerely,

A handwritten signature in black ink, appearing to read "Kendalle O'Connell".

Kendalle Burlin O'Connell  
CEO & President  
MassBIO

A handwritten signature in black ink, appearing to read "Patrick J. Plues".

Patrick J. Plues  
Vice President, State Government Affairs  
Biotechnology Innovation Organization