

Centers for Medicare & Medicaid Services Overview of Vaccine Coverage

December 2025

Medicaid and CHIP



- Coverage of vaccines is anchored to ACIP recommendations, and the adult/pediatric vaccine schedules, which is based on those recommendations.
- State Medicaid and Children's Health Insurance Programs (CHIP) are required to cover all vaccines recommended by CDC/ACIP that are included on the adult/pediatric immunization schedules without cost sharing for most beneficiaries, including children and adults.*
- Recommendations included on the pediatric/adult immunization schedules that refer to shared clinical decision making, also known as individual-based decision making, are mandatorily covered in both Medicaid and CHIP.
- The Vaccines For Children (VFC) program is a vaccine distribution program overseen by CDC that provides federally purchased vaccines to children through age 18 who are either enrolled in Medicaid, uninsured, underinsured, or American Indian/Alaska Native. Each state runs a VFC program according to CDC guidelines, typically through the state health department, and makes state coverage decisions.

* Mandatory Medicaid vaccination coverage varies between adults and children, see the coverage chart on slide 4 for more information.

Medicaid and CHIP (continued)



- States have flexibility to determine Medicaid/CHIP coverage beyond mandatory coverage anchored to the ACIP/CDC recommendations and the pediatric and adult immunization schedules. Therefore, any recommendation that is not on the pediatric vaccine schedule or any recommendation that narrows the criteria will lead to variable coverage across state Medicaid & CHIP programs.
- In Medicaid, through Early and Periodic Screening, Diagnostic, and Treatment (EPSDT) requirements, coverage for individuals up to age 21 could include additional vaccinations beyond what is included on the vaccine schedule based on the state's medical necessity criteria. In CHIP, states have the flexibility to choose to cover vaccines beyond what is included in the immunization schedule.
- If states opt to provide expanded vaccine coverage, they will receive federal match for the full scope of coverage. States may not need approval from CMS to provide coverage beyond the ACIP recommendation as that level of detail is not required in the Medicaid & CHIP state plans.

Medicaid and CHIP (continued)



Population	Is coverage of vaccines and their administration mandatory?
Adult Medicaid Full Coverage/Full Benefit Enrollees	YES, for <u>all categories of ACIP recommendations</u> .
Adults Enrolled in Alternative Benefit Plans (typically adults enrolled in the Medicaid expansion)	YES, for <u>all routine ACIP recommendations (those on the adult/pediatric immunization schedule)</u> . States that align ABP coverage with state plan coverage will need to cover all ACIP recommended vaccinations per the IRA coverage requirements.
Child Medicaid Full Coverage/Full Benefit Enrollees Aged 18 and Younger	YES, for <u>all vaccines on the CDC/ACIP pediatric schedule and those vaccinations determined to be medically necessary</u> as established by the state. Therefore, any recommendation that is not on the pediatric vaccine schedule or any recommendation that narrows the criteria will lead to variable coverage across state Medicaid & CHIP programs.
Child Medicaid Full Coverage/Full Benefit Enrollees Aged 19 and Older	YES, for <u>all categories of ACIP recommendations</u> .
CHIP Enrollees	YES, for <u>all categories of ACIP recommendations</u> .

Private / Employer Sponsored Plans



- Non-grandfathered employer-sponsored plans and non-grandfathered group and individual health insurance coverage are required to cover all ACIP-recommended vaccines for routine use without cost sharing.
 - This includes recommended vaccines on the pediatric vaccine schedule.
- With respect to employer-sponsored and individual health insurance coverage (as opposed to self-insured employer-sponsored plans governed by ERISA), states may impose benefit mandates, including vaccination mandates, that are more expansive than Federal requirements.
- Plans and issuers are required to continue to cover the vaccine in a manner consistent with the current recommendation for the duration of a plan or policy year before the applicable plan or policy year of the new recommendation, unless doing so would pose a significant safety concern.