Fact Sheet: Inflation Reduction Act changes to Medicaid & Children's Health Insurance Program (CHIP) Adult Vaccine Coverage



In August 2022, President Biden signed the Inflation Reduction Act (IRA) of 2022 (P.L. 117-169) into law. The IRA amended the Medicaid and Children's Health Insurance Program (CHIP) statutes to require Medicaid and CHIP coverage and payment without cost sharing beginning October 1, 2023 for U.S. Food and Drug Administration approved adult vaccines recommended by the Advisory Committee on Immunization Practices (ACIP) and their administration.

Which vaccines do states have to cover beginning October 1, 2023?

Beginning October 1, 2023, state Medicaid and CHIP programs must cover vaccines that are approved by the FDA for use by adult populations and administered in accordance with ACIP recommendations. As explained in the [SHO letter], CMS does not interpret the IRA-required coverage to include vaccines that FDA has authorized for use under emergency use authorization, but has not approved. CMS interprets the statutory references to "adults" to mean persons age 19 and older.

Additionally, beginning October 1, 2023, CMS interprets the statutory reference to ACIP recommendations to include any category of ACIP recommendations. There are multiple categories of ACIP recommendations for adult vaccines, including recommendations described on the Centers for Disease Control and Prevention (CDC)/ ACIP adult immunization schedule (as determined by age and risk and recommendations for shared clinical decision-making), as well as recommendations based on risk due to health condition, occupation, and travel. Some recommendations are for routine use, and some are not. Because CMS interprets the IRA coverage requirement to include any category of ACIP recommendations, that coverage requirement is not limited to vaccines that CDC/ACIP include on the immunization schedules or recommend for routine use. It would include approved vaccines identified on the CDC/ACIP adult immunization schedule, such as the shingles and influenza vaccines, as well as approved vaccines recommended for specific populations, such as the mpox vaccines, as long as the beneficiary meets the ACIP recommendation's criteria.

Who is eligible to receive these mandatory vaccination services?

This new mandatory coverage applies to nearly all full-benefit beneficiaries aged 19 and older covered under traditional Medicaid, and CHIP beneficiaries aged 19 and older.

Will Medicaid and CHIP beneficiaries who are eligible for the newly required coverage have to pay anything for these newly covered vaccines or their administration?

No. Medicaid and CHIP beneficiaries age 19 and older who are eligible for the newly required coverage will have no cost sharing for any FDA-approved adult vaccines that are administered in accordance with any category of ACIP recommendations, and will also have no cost-sharing for the administration of these vaccines.

Is there enhanced federal funding for state expenditures on these adult vaccines?

States will receive the applicable regular Medicaid federal medical assistance percentage (FMAP) and CHIP FMAP for their expenditures on the adult vaccinations they are required to cover under the IRA. In addition, states that, as of August 16, 2022, were covering approved, ACIP-recommended adult vaccinations, without cost sharing, can claim a one percentage point increase in the FMAP for their Medicaid expenditures on these vaccination services for the first eight fiscal quarters that begin on or after October 1, 2023.

At the conclusion of the eight fiscal quarters (September 30, 2025), these states' Medicaid expenditures for vaccines and vaccine administration described in section 1905(a)(13)(B) of the Act will be matched at the applicable regular FMAP. .

Where can I find more information?

Please see the Mandatory Medicaid and Children's Health Insurance Program Coverage of Adult Vaccinations under the Inflation Reduction Act for more information.

