

September 10, 2025

To: Colorado's Division of Insurance

From: American Academy of Pediatrics, Colorado Chapter
Children's Hospital Colorado
Colorado Academy of Family Physicians
Colorado ACOG
Colorado Chapter of the American College of Physicians
Colorado Children's Campaign
Colorado Hospital Association
Colorado Medical Society
Colorado Pharmacist Society
Immunize Colorado

Re: Support for DRAFT Proposed Emergency Regulation 25-E-XX
Concerning Coverage of COVID-19 Vaccines as a Preventive Service

As Colorado enters the upcoming flu and respiratory illness season, it is essential that Coloradans have reliable access to evidence-based immunizations that protect health and save lives. **To that end, our organizations strongly support the proposed emergency regulation ensuring COVID-19 vaccines are covered as a preventive service.**

Access to vaccines is a nonpartisan and longstanding public health priority. It is foundational to keeping children, families, and communities healthy and resilient. Yet, recent federal actions have created unnecessary confusion and restricted access, without scientific justification for such changes. These actions threaten to leave too many Coloradans unprotected, including young children and pregnant people. This is especially troubling as these populations remain at increased risk for serious illness from COVID-19. Therefore, it is imperative that the state take action.

Clear guidance, dependable coverage, and equitable access to immunizations are critical. Along with recommendations for other [childhood immunizations](#), the American Academy of Pediatrics [advises](#) all young children ages 6-23 months get vaccinated against COVID-19, as well as children ages 2-18 years who are at high risk and those whose parent or guardian desires their protection.

We commend DOI for taking proactive steps to reduce delays and protect access to COVID-19 vaccines. Colorado must do all that it can to support children and families working to safeguard their health and keeping our communities safe. **The proposed regulation will help ensure that COVID-19 vaccines remain available to Coloradans as preventive care, free from financial barriers.**

If you have questions, need additional information, or would like to arrange a follow-up discussion, please contact Ellen Brilliant, AAP Colorado's Executive Director at 303.601.8308.