



Dr. Mehmet Oz
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
7500 Security Blvd.
Baltimore, MD 21244-8016

February 4, 2026

RE: Removing Child Immunization Rates from the Child Core Health Care Quality Measurement Set

Dear Administrator Oz:

On behalf of the Governors Public Health Alliance (PHA), we write to express our deep concern about the Centers for Medicare & Medicaid Services (CMS)'s decision to eliminate childhood immunization rates from the Core Set of Children's Health Care Quality Measures for Medicaid and the Children's Health Insurance Program (CHIP) (the Child Core Set). PHA is a nonpartisan coalition that was founded by 15 governors, representing approximately one-third of the U.S. population, committed to protecting and advancing the health and wellbeing of the millions of children and families across our states.¹ As governors responsible for implementing public health policy and administering Medicaid programs in our states, we rely on consistent, reliable data to manage our programs effectively, monitor health outcomes, and allocate resources appropriately. This decision significantly undermines our ability to fulfill these responsibilities and protect the health of the millions of children who depend on Medicaid and CHIP.

The removal of this critical child health indicator was announced to state health officials on December 30, 2025, with no advance consultation with states and no opportunity for public comment. As governors responsible for implementing these federal programs, we are troubled that such a consequential decision affecting the health and wellbeing of millions of children was made without state input or opportunity for public comment.

The Core Sets are typically updated through a structured annual process involving a workgroup of Medicaid and CHIP stakeholders and quality measurement experts, public comment periods, and broad engagement with the medical and public health communities. This decision circumvented that entire process, providing no opportunity for pediatricians, children's hospitals, state Medicaid directors, public health officials, or other stakeholders to provide input. Abandoning this transparent, evidence-driven process raises serious questions about the basis for the decision and undermines trust in the integrity of quality measurement.

¹ PHA membership includes California Governor Gavin Newsom, Colorado Governor Jared Polis, Connecticut Governor Ned Lamont, Delaware Governor Matt Meyer, Guam Governor Lou Leon Guerrero, Hawai'i Governor Josh Green, Illinois Governor JB Pritzker, Maryland Governor Wes Moore, Massachusetts Governor Maura Healey, New Jersey Governor Mikie Sherrill, New York Governor Kathy Hochul, North Carolina Governor Josh Stein, Oregon Governor Tina Kotek, Rhode Island Governor Daniel McKee, and Washington Governor Bob Ferguson.



Congress mandated Child Core Set reporting to ensure federal investments support high-quality care and improve child health outcomes. By eliminating this state reporting, CMS has made it substantially more difficult for state Medicaid programs to understand vaccination trends, compare performance across states, make informed policy decisions, and meet health policy goals. States cannot effectively manage programs without reliable data. Without this standardized information, states lack the tools needed to assess whether children retain access to essential preventive services or to understand how federal policy changes affect vaccination rates.

This decision follows closely on CDC's recent revision of childhood vaccine recommendations, which removed universal recommendations for several vaccines including influenza, rotavirus, RSV, hepatitis A, hepatitis B, and meningococcal disease. By eliminating systematic measurement immediately after weakening vaccine recommendations, the federal government is obscuring the consequences of its own policy choices. Neither states nor the federal government can assess the real-world impact of these changes on children's health, making it impossible to course-correct if these policy decisions prove harmful.

This change comes at a particularly dangerous moment. The nation is experiencing a significant resurgence of vaccine-preventable diseases. Measles cases have exceeded 2,000 known infections across 44 states and nearly 50 separate outbreaks, the most since 1991.² Canada has lost its measles elimination status, and current trends threaten the United States' own status. Disease outbreaks do not respect state borders. While states may continue to collect data about vaccination rates in our own populations, the elimination of mandatory reporting means we will lose visibility into vaccination trends in neighboring states and across the country. Precisely when we need comprehensive data about vaccination coverage nationwide to anticipate and respond to disease spread, CMS is eliminating the tool that allows states to see beyond their own borders. Our state and local health departments must respond to public health emergencies that cross state lines yet will now do so with diminished visibility into vaccination coverage in other states and reduced ability to develop coordinated health policy responses.

The states represented by the PHA are committed to ensuring robust childhood vaccination programs that protect all children in our communities. We urge you to immediately reverse this decision and restore the vaccination rate quality measures in the Child Core Set immediately to protect the health and lives of American children.

Sincerely,

Angela Botticella
Managing Director
Governors Public Health Alliance

² Devi Shastri, *The U.S. is on the verge of losing its measles elimination status*, PBS NEWS (Jan. 20, 2026), <https://www.pbs.org/newshour/science/the-u-s-is-on-the-verge-of-losing-its-measles-elimination-status>.