

Regulatory Brief: Coverage and Administration of Flu Vaccines with Thimerosal

Overview: This regulatory brief summarizes the limited impact ACIP recommendations on flu vaccines with thimerosal will have on coverage and administration of flu vaccines for the 2025-2026 respiratory virus season.

On June 26, 2025, the Advisory Committee on Immunization Practices (ACIP) recommended that all individuals receive seasonal flu vaccines only in single dose formulations that are free of thimerosal as a preservative. Health and Human Services (HHS) Secretary Robert Kennedy Jr. has approved this recommendation, and the Centers for Disease Control & Prevention (CDC) vaccine schedules will be revised to reflect these recommendations. Only a small fraction of flu vaccines contain thimerosal, so the impact of this change will be limited.

What does this mean for coverage of flu vaccines with thimerosal?

- For most populations, federal law requires no-cost coverage only for vaccines on the CDC's Immunization Schedules. However, Medicaid programs and commercial plans can choose to cover additional vaccines beyond that minimum and can choose not to impose cost sharing for those additional vaccines/indications. (States can also require plans to enhance coverage for state-regulated plans.)
- People under age 21 covered in Medicaid are entitled to all medically necessary vaccines, even if not on the Immunization Schedules.
- Vaccines for Children distributes free vaccine only if on a list published by the CDC Advisory Committee on Immunization Practices.
- Medicare Part B, including Medicare Advantage, covers flu vaccine without cost for all Medicare beneficiaries.

What does this mean for who can administer flu vaccines with thimerosal?

- Under temporary federal policies, pharmacists, pharmacy technicians, and pharmacy interns are entitled to administer (and pharmacists are entitled to prescribe) flu vaccines consistent with CDC recommendations. Because CDC no longer recommends the thimerosal-containing flu vaccine, whether pharmacists and pharmacy technicians can administer (and pharmacists can prescribe) thimerosal-containing vaccine will depend on state law. (Because the vast majority of flu vaccine does not contain thimerosal, this change will not affect pharmacists in most cases.)
- In many states, pharmacist vaccination authority is linked to ACIP recommendations/CDC Schedules in some way. Pharmacy personnel should consult their state's scope of practice laws to determine whether it is within their scope of practice to administer a flu vaccine containing thimerosal given the updated CDC recommendation.
- Similarly, liability protections for administration of the flu vaccine pursuant to the Countermeasures Injury Compensation Program apply to pharmacy personnel only if the vaccine is "ordered and administered" according to CDC/ACIP's recommendations. Given the CDC's recent recommendation that thimerosal-containing vaccines no longer be used, administration of these formulations would no longer meet CDC/ACIP criteria for liability protections under this program.

About the Common Health Coalition (CHC)

Founded in 2023, the Common Health Coalition (CHC) brings together leading health organizations in pursuit of a reimagined health system, one in which the nation's healthcare and public health systems no longer work in parallel, but hand in hand, with better health for all as the common goal. The Coalition encompasses 300+ members across the country. CHC is working with providers, payers, public health agencies, and other key actors to develop and implement a coordinated strategy for the continued coverage, access, and uptake of COVID-19 and flu vaccines and RSV immunizations. Focusing on the fall respiratory season, CHC is building consensus on industry best practices for vaccine access, analyzing and navigating the evolving coverage and regulatory landscape, and developing tools that promote a shared understanding of key issues and impacts across all stakeholders.

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