

Regulatory Brief: Coverage and Administration of COVID-19 Vaccine for Pregnant People

Overview: This regulatory brief summarizes current policies and recent changes to the coverage and administration of the COVID-19 vaccine for pregnant people.

Effective May 29, 2025, the Centers for Disease Control & Prevention (CDC) revised the 2024-2025 COVID-19 vaccine recommendations in its Immunization Schedules for [adults](#) and [children & adolescents](#). CDC withdrew its prior recommendation of “routine use” of the COVID-19 vaccine for pregnant people (of any age) and currently has no recommendation for this group. These recommendations (or lack thereof) are specific to the 2024-2025 vaccines, ACIP will need to issue new recommendations (or not) for the 2025-2025 COVID-19 vaccines. The FDA-approved labels ([Pfizer](#), [Moderna](#), and [Novavax](#)) do not exclude pregnant people.

What do these changes mean for COVID-19 vaccine insurance coverage for pregnant people?

- 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 baseline and not impose cost sharing for those additional vaccines/indications. (States can also require plans to enhance coverage for state-regulated plans).
 - Note that these changes to the CDC schedules have not followed the formal process of an Advisory Committee on Immunization Practices (ACIP) recommendation and CDC Director adoption via publication in the Morbidity and Mortality Weekly Report (MMWR). This may create ambiguity around the current legal status of mandated coverage. Insurers may wish to continue providing coverage for COVID-19 vaccination during pregnancy, both to ensure access for this higher-risk population and in light of potential uncertainty regarding whether the change has full legal effect absent formal ACIP action.
- Pregnant people who are under age 21 and covered by Medicaid are entitled to all medically necessary vaccines, even those not on the Immunization Schedules.
- The Vaccines for Children Program distributes free vaccines that are listed by ACIP.
- Medicare Part B, including Medicare Advantage, covers the COVID-19 vaccine without cost for all Medicare beneficiaries.

What do these changes mean for who can administer COVID-19 vaccines to pregnant people?

- Under temporary federal policies, pharmacists and other pharmacy personnel are provided certain liability protections, including with respect to state licensing boards, effectively enabling them to administer COVID-19 vaccines consistent with CDC recommendations.

Coverage and Administration of COVID-19 for Pregnant Population

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- o Where CDC recommendations do not apply to specific populations, such as the COVID-19 vaccine for pregnant persons, the scope of pharmacy personnel's authority to order and administer vaccines is determined by applicable state law.
 - o Because the CDC no longer has a COVID-19 recommendation for pregnant people, state law will determine whether pharmacists, pharmacy technicians and pharmacy interns can order and administer this vaccine.
- 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 COVID-19 vaccine to pregnant people in the absence of a current CDC recommendation.
- Similarly, liability protections for administration of the COVID-19 vaccine pursuant to the Countermeasures Injury Compensation Program apply to pharmacy personnel¹ only if the vaccine is "ordered and administered" in accordance with CDC/ACIP's recommendations.
- Other types of providers are not affected by this change.

¹ The Declaration also authorizes certain other healthcare professionals whose scope of practice may not ordinarily include vaccination (e.g., EMTs) certain healthcare professionals whose license has lapsed in the last five years, and certain healthcare professional students to administer Covid and flu vaccines, only to the extent consistent with CDC schedules.

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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