State Vaccine Policies

Updated 28 May 2026

Action: States are increasingly questioning whether Federal vaccine guidance should remain the default standard for state policy. In response to Federal vaccine policy changes, state governments have diverged significantly on vaccine policy initiatives. Lawmakers across 49 states have introduced at least 532 vaccine-related bills in 2025, with activity focused on access and coverage, school requirements and exemptions, provider authority, parental rights, public health messaging, and limits on vaccine mandates[1].

Trusted Insights for What's Ahead®

- Historically, recommendations from the Centers for Disease Control (CDC) and the Advisory Committee on Immunization Practices (ACIP) at HHS shaped school requirements, insurance coverage, Medicaid policy, pharmacist authority, and employer health-plan design. Recent Federal changes have prompted states to preserve broader vaccine standards, substitute state or medical society guidance, or restrict mandates and public health authority. This has led to the emergence of several distinct state policy tracks:
  - **Access, coverage, and cost:** States are acting to preserve or expand vaccine access, require or encourage insurance coverage without cost-sharing, fund immunization programs, and maintain affordability even if federal recommendations change.
  - **School requirements and exemptions:** States are revising school immunization rules, documentation requirements, reporting timelines, exemption procedures, opt-out processes, and public disclosure requirements.
  - **Provider scope of practice and vaccine delivery capacity:** States are expanding or clarifying which providers may administer vaccines, including pharmacists, technicians, nurses, dentists, physical therapists, and other health professionals.
  - **Parental rights, consent, public health messaging, and medical freedom:** States are advancing measures related to parental consent, limits on mandates, restrictions on public health authority, vaccination-status discrimination protections, and standards for public health communications.

- "Medical freedom" legislation granting parents greater authority on their children's vaccinations is the clearest sign of regulatory fragmentation, with states increasingly looking beyond more permissive Federal guidance. A majority of states have now incorporated vaccine guidance from non-Federal sources, such as state health departments, legislatures, or medical societies, either alongside or instead of CDC/ACIP recommendations.[2] This marks a shift from specific vaccine requirements to defining the operative scientific and legal standard for immunization policy.

- **What this means for business:**
  - Vaccine policy is becoming a test case for broader health policy fragmentation. States are responding to Federal changes by preserving, modifying, or rejecting CDC/ACIP guidance, leading to a less predictable environment for health benefits, workforce planning, school and childcare stability, and public health preparedness.

- Employers, insurers, health systems, universities, and pharmacy providers must respond to this fragmentation of a once-stable national framework. Organizations may face different state rules on workplace policies, exemptions, documentation, insurance coverage, and public health responses, making uniform national policies and benefit designs harder to maintain.
- The most immediate business implications are for health coverage and employer authority. State insurance regulators may require coverage of vaccines that Federal guidance no longer treats as routine, while “medical freedom” laws could limit employer flexibility in sectors such as health care, elder care, education, hospitality, logistics, transportation, and manufacturing.
- Changes to school vaccine rules and outbreak protocols may affect absenteeism, childcare reliability, and labor-force absenteeism; while differing provider scope-of-practice and vaccine access rules could complicate pharmacy, provider, employer clinic, and retail health models. A more fragmented state framework could also make outbreak response less predictable for businesses planning employee health, facilities, travel, and customer-facing operations.

[1] https://www.ncsl.org/state-legislatures-news/details/states-weigh-their-options-amid-fed-changes-to-vaccine-policy

[2] https://www.kff.org/state-health-policy-data/state-recommendations-for-routine-childhood-vaccines-increasing-departure-from-federal-guidelines

The Conference Board is the global, Member-driven think tank that delivers ***Trusted Insights for What's Ahead®***. Founded in 1916, we are a nonpartisan, not-for-profit organization. TCB.org | Learn about Membership

© 2026 The Conference Board, Inc.