



Janet T. Mills
Governor

STATE OF MAINE
DEPARTMENT OF PROFESSIONAL & FINANCIAL REGULATION
BUREAU OF INSURANCE



Joan F. Cohen
Commissioner

Bulletin 486

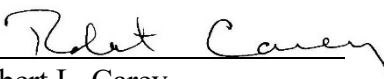
Coverage for Immunizations, Including Covid-19 Vaccines

Pursuant to Maine law, health insurance carriers are required, at a minimum, to provide coverage for immunizations “that are consistent with the recommendations of the American Academy of Pediatrics, the American Academy of Family Physicians or the American Academy of Obstetricians and Gynecologists [collectively, the Medical Academies]” 24-A M.R.S. § 4320-A(1)(B). This includes coverage for the Covid-19 vaccine, when recommended by the Medical Academies. There is also a separate mandate for coverage of any Covid-19 vaccine “licensed or authorized under an emergency use authorization by the United States Food and Drug Administration,” 24-A M.R.S. § 4320-P(3)(A). These two provisions operate independently, and either one, if it applies, is sufficient to require the carrier to provide coverage.

Where the Covid-19 vaccine is a mandated coverage under either of Sections 4320-A(1)(B) or 4320-P(3)(A), Maine law also requires carriers to cover the cost of the Covid-19 vaccine and all associated costs of administration, without cost sharing or prior authorization.¹ Carriers may only require use of their network as a condition for first-dollar Covid-19 vaccine coverage if the immunization is available from a network pharmacy or other network provider with no additional delay.²

When carriers are acting as administrators for self-insured and level-funded health benefit plans, the Superintendent expects carriers to make plan sponsors aware of the immunization recommendations for the Covid-19 vaccine by the Medical Academies and encourage all plan sponsors to follow the provisions of this Bulletin.

September 12, 2025


Robert L. Carey
Superintendent of Insurance

NOTE: This Bulletin is intended solely for informational purposes. It is not intended to set forth legal rights, duties, or privileges, nor is it intended to provide legal advice. Readers should consult applicable statutes and rules and contact the Bureau of Insurance if additional information is needed.

¹ 24-A M.R.S. § 4320-P(3)(B) & (C).

² 24-A M.R.S. § 4320-P(3)(D).