



**RICARDO LARA**  
CALIFORNIA INSURANCE COMMISSIONER

## **BULLETIN 2025-14**

**TO:** All Health Insurers<sup>1</sup>  
**FROM:** Insurance Commissioner Ricardo Lara  
**DATE:** September 30, 2025  
**RE:** Chaptered Assembly Bill 144 and Coverage of Preventive Care Services

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On September 17, 2025, Governor Gavin Newsom signed [Assembly Bill \(AB\) 144](#) (Assembly Committee on Budget, Stats. 2025, Ch. 105). In part, AB 144 ensures California consumers have continued access to necessary preventive care services. AB 144 directs health insurers to cover preventive care items and services, including immunizations, if such care was recommended by existing federal bodies<sup>2</sup> as of January 1, 2025, or is recommended by the California Department of Public Health (CDPH). AB 144 is an urgency measure that went into effect immediately.

This Bulletin outlines the obligations of health insurers to cover preventive care items and services prior to enactment of AB 144 and summarizes AB 144's new requirements regarding coverage of preventive care items and services. The Bulletin also highlights recent recommendations by CDPH regarding immunizations to protect against coronavirus disease 2019 (COVID-19), respiratory syncytial virus (RSV), and influenza.

### **I. Background**

California Insurance Code (CIC) sections 10110.7, 10110.75, 10112.2, 10123.5, and 10123.55 each include requirements related to coverage of preventive care. State law requirements prior to the adoption of AB 144 are detailed in this section.

#### *A. Previous CIC section 10112.2 (immunizations and preventive services generally)*

CIC section 10112.2 specifically requires health insurers to cover preventive care items and services that have an "A" or "B" recommendation from the United States Preventive Services Task Force (USPSTF).

With respect to women, infants, children, and adolescents, insurers must cover without cost-sharing the evidence-informed preventive care services and screenings contained in the comprehensive guidelines supported by the United States Health Resources and

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<sup>1</sup> This Bulletin applies to all health insurers as defined by California Insurance Code section 106(b), including student health insurance, as defined under CIC section 10965.03.

<sup>2</sup> E.g., the Advisory Committee on Immunization Practices (ACIP) of the federal Centers for Disease Control and Prevention (CDC), the United States Preventive Services Task force (USPSTF), or the United States Health Resources and Services Administration (HRSA).

Services Administration (HRSA).<sup>3</sup> Likewise, those sections require insurers to cover immunizations recommended by the Advisory Committee on Immunization Practices (ACIP) of the federal Centers for Disease Control and Prevention (CDC). These coverage requirements include preventive care items and services, including immunizations. Insurers must cover such services without cost-sharing, consistent with section 10112.2.

*B. Previous CIC sections 10110.7 (COVID-19 preventive services and immunizations) and 10110.75 (declared public health emergency)*

CIC sections 10110.7 and 10110.75 specifically include coverage requirements for items and services to prevent or mitigate COVID-19 or any other disease for which the Governor has declared a public health emergency. Insurers must cover such services without cost-sharing or utilization management in many cases, consistent with sections 10110.7 and 10110.75.

*C. Previous CIC sections 10123.5 and 10123.55 (childhood and adolescent immunizations and preventive services)*

CIC sections 10123.5 and 10123.55 provided that group health policies must cover periodic health evaluations, immunizations, and laboratory services as contained in the Recommended Childhood Immunization Schedule/United States, jointly adopted by the American Academy of Pediatrics, the ACIP, and the American Academy of Family Physicians.

*D. Recent Changes to FDA Approval for COVID-19 Vaccines*

In August, the U.S. Food and Drug Administration (FDA) released approvals for several COVID-19 vaccines.<sup>4</sup> Unlike previous approvals, the FDA approved these vaccines only for individuals 65 years of age and older or for people who are younger than 65 but have at least one underlying condition that puts them at high risk for severe outcomes from COVID-19.

**II. AB 144 Provides that the Federal Recommendations in Effect on January 1, 2025 Serve as a Baseline, and Allows the California Department of Public Health to Supplement those Recommendations**

AB 144, available at [this link](#), amends CIC sections 10110.7, 10110.75, 10112.2, 10123.5, and 10123.55. These amendments took effect immediately on September 17, 2025, when the Governor signed AB 144. The requirements of AB 144 are set forth below.

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<sup>3</sup> Insurance Code section 10112.2.

<sup>4</sup> The approved COVID-19 vaccines are: MNEXSPIK and SPIKEVAX (both manufactured by Moderna Tx, Inc.); COMIRNATY (manufactured by BioNTech Manufacturing GmbH); and NUVAXOVID (manufactured by Novavax, Inc.).

*A. Amendments to CIC section 10112.2 (immunizations and preventive services generally)*

CIC section 10112.2, as amended by AB 144, requires health insurers to cover, without cost-sharing all items, services integral to the provision of preventive items, and services with a USPSTF “A” or “B” recommendation, a recommendation by ACIP and/or those items and services consistent with HRSA guidelines as of January 1, 2025.<sup>5</sup> Health insurers must continue to cover these services even if the USPSTF, ACIP, or HRSA remove or downgrade their recommendations. The AB 144 amendments allow CDPH to modify or supplement the USPSTF, ACIP, and HRSA recommendations and require insurers to cover the modifications or supplements within 15 business days after CDPH publishes the updated recommendations.

*B. Amendments to CIC sections 10110.7 (COVID-19 preventive services and immunizations), and 10110.75 (declared public health emergencies)*

CIC section 10110.7, as amended by AB 144, requires health insurers to cover, without cost-sharing or utilization management all items, services integral to the provision of preventive items, and services to prevent or mitigate COVID-19 and with a USPSTF “A” or “B” recommendation, or a recommendation by ACIP as of January 1, 2025. The AB 144 amendments allow CDPH to modify or supplement the USPSTF, and ACIP recommendations and require insurers to cover the modifications or supplements within 15 business days after CDPH publishes the updated recommendations.

Similarly, section 10110.75, as amended by AB 144, requires health insurers to cover, without cost-sharing or utilization management, all items, services integral to the provision of preventive items, and services to prevent or mitigate a disease when the Governor of the State of California has declared a public health emergency due to that disease with a USPSTF “A” or “B” recommendation, or a recommendation by ACIP as of January 1, 2025. The AB 144 amendments allow CDPH to modify or supplement the USPSTF and ACIP recommendations and require insurers to cover the modifications or supplements within 15 business days after CDPH publishes the updated recommendations. In addition to the CDPH recommendations and the USPSTF recommendations, the AB 144 amendments also require that coverage of an item, service, or immunization must be covered 15 business days after the the American Academy of Pediatrics, the American College of Obstetricians and Gynecologists, the American Academy of Family Physicians, or CDPH makes a recommendation relating to the item, service, or immunization.

*C. Amendments to CIC sections 10123.5 and 10123.55 (childhood and adolescent preventive services and immunizations)*

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<sup>5</sup> Please note that the HRSA guidelines were updated in December 2024 for Screening and Counseling for Intimate Partner and Domestic Violence, Breast Cancer Screening for Women at Average Risk, and a new guideline for Patient Navigation Services for Breast and Cervical Cancer Screening was introduced. Because these changes occurred prior to January 1, 2025, health insurers must incorporate these changes into practice for the 2026 plan year.

The amendments to CIC sections 10123.5 and 10123.55 require group health insurance products to cover the childhood periodic health evaluations, immunizations, and laboratory services contained in the Recommended Childhood Immunization Schedule/United States, jointly adopted as of January 1, 2025, by the American Academy of Pediatrics, ACIP, and the American Academy of Family Physicians.<sup>6</sup> CDPH may modify or supplement such recommendations taking into consideration guidance and recommendations from additional medical and scientific organizations, including, but not limited to, the American Academy of Pediatrics, the American College of Obstetricians and Gynecologists, and the American Academy of Family Physicians.

#### *D. Health Savings Account-eligible High-Deductible Health Plans*

For insureds in health savings account (HSA)-eligible high-deductible health plans (HDHPs), insurers must cover preventive services in conformance with AB 144, unless doing so would disqualify the HDHP from eligibility for an HSA pursuant to Internal Revenue Code section 223 (26 U.S.C. § 223).

### **III. CDPH Immunization Recommendations**

On September 17, 2025, CDPH issued guidance regarding COVID-19, influenza, and RSV immunizations. That guidance can be found [here](#) and provides as follows:

- **COVID-19**
  - **Children:**
    - All children 6-23 months;
    - All children 2-18 years with [certain risk factors](#); and,
    - All children with close contact with others with risk factors; All children who choose protection.
  - **Adults:**
    - All adults age 65 years or older;
    - All adults ages 18-64 years with certain [risk factors](#);
    - All adults with close contact with others with [risk factors](#); and,
    - All adults who choose protection.
  - **Pregnancy:**
    - All planning, pregnant, postpartum, or lactating.
- **Influenza**
  - **Children:**
    - All children 6 months or older.
  - **Adults:**
    - All adults 18 years or older.
  - **Pregnancy:**
    - All planning, pregnant, postpartum, or lactating.
- **RSV**

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<sup>6</sup> Please note that any changes made by ACIP after January 1, 2025, including the removal or modification of prior recommendations for vaccinations and the timing of their administration, shall not be considered when determining health insurance coverage.

- **Children:**
  - All children 8 months or younger; and,
  - All children 8-19 months with [risk factors](#).
- **Adults:**
  - All adults 75 years or older; and,
  - All adults 50-74 years with [risk factors](#).
- **Pregnancy:**
  - Pregnant between 32-36 weeks gestational.

Health insurers must cover CDPH-recommended immunizations with the cost-sharing and utilization management limitations consistent with AB 144. If the immunization is not already encompassed within recommendations by ACIP or the USPSTF, health insurers must begin covering the immunization by October 8, 2025, which is 15 business days following CDPH's publication of its recommendation.

Please note, the FDA currently recommends COVID-19 immunizations only for people who are 65 years of age or older, or for younger people with at least one underlying condition that puts them at greater risk for COVID-19. Notwithstanding the FDA's recommendation, per AB 144, health insurers must cover COVID-19 immunizations per CDPH's recommendations even if doing so could be considered "off label."

If you have questions regarding this Bulletin, please contact Stesha Hodges, Chief of the California Department of Insurance's Health Equity and Access Office, at [Stesha.Hodges@insurance.ca.gov](mailto:Stesha.Hodges@insurance.ca.gov).