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Congress of the United States  
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COMMITTEE ON HOMELAND SECURITY

OVERSIGHT, MANAGEMENT,  
AND ACCOUNTABILITY  
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AND RECOVERY

COMMITTEE ON THE BUDGET

March 17, 2021

Gene Dodaro  
Comptroller General  
Government Accountability Office  
441 G St., NW  
Washington, DC 20548

Dear Mr. Dodaro:

Thank you for your important work in ensuring appropriate usage of taxpayer resources, especially during the COVID-19 public health emergency that has led to an unprecedented level of government spending.

The Department of Health and Human Services in conjunction with Operation Warp Speed and the Centers for Disease Control and Prevention established a formula for state vaccine allocations of federally procured vaccine doses. According to a Department of Defense blog post<sup>1</sup>, these doses are allocated to the states on a pro rata basis, as population-based methodology is “the most fair and equitable division of available vaccines”.

While the intent was a fair and equitable division of available vaccines, it has been apparent that allocations have fallen short of this goal. Population data is derived from outdated American Community Survey data, rather than a more recent American Community Survey data release.

Despite the announced formula methodology, state vaccine allocation reporting has shown a wide discrepancy from what would be expected under a population-adjusted vaccine allocation approach. Under a pro-rata model, when population adjusted, allocations should have a limited degree of variability across states. Instead, the range of pro rata vaccine allocations varies widely. While Texas and California are similar in demography, they have differed widely in number of allocations<sup>2</sup>. For instance, data captured on January 14, 2021 showed that total allocations to Texas were 7,602 doses per 100,000 individuals. On that day, the national average of allocations to the states was 9,339 per 100,000 individuals<sup>3</sup>. Fast forward to data captured on March 12, 2021, where reporting shows that Texas has been allocated 37,542 doses per 100,000 individuals, compared to the national average of 41,871 doses per 100,000 individuals. When adjusted even further for population of individuals over the age of 18, Texas still ranks in the bottom third at 50,406 doses per 100,000 (adults) compared to the average of 53,797 doses per 100,000<sup>4</sup>.

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1 <https://www.defense.gov/Explore/News/Article/Article/2441698/pro-rata-vaccine-distribution-is-fair-equitable/>

2 <https://www.houstonchronicle.com/news/investigations/article/Nobody-is-getting-enough-Texas-near-the-15906851.php>

3 Data generated from CDC website, January 14, 14:32:58 GMT-0500 (Eastern Standard Time)

4 Data generated from CDC website, March 12, 16:24:30 GMT-0500 (Eastern Standard Time)

**I am requesting that you conduct an audit of direct vaccine allocations to the states and territories. Please include the following information:**

1. Methodology the federal government is using to make direct allocations to the states and territories
2. Vaccine allocations made directly to the states and territories under this methodology
3. Comparison between total (to date) direct allocations to states and territories and total (to date) direct allocations to states and territories using the methodology prescribed by the federal government.

Please limit the scope of the audit to direct allocations made to the state and territories by the federal government, not allocations to federal entities or programs within a state or territory. Additionally, the scope of the audit should not include the Sovereign Nation Supplement as a part of allocations to the states or territories.

For further questions about this request, please contact my office at (202) 225-6565.

Never Forget,

A handwritten signature in blue ink, appearing to read "Dan Crenshaw". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Dan Crenshaw  
Member of Congress