



RE: Docket No. CDC-2025-0024

Dear ACIP Voting and Liaison Members:

We, the undersigned members of the Adult Vaccine Access Coalition (AVAC) appreciate the opportunity to offer public written comment as part of the June 25-26, 2025 meeting of the Centers for Disease Control and Prevention (CDC) Advisory Committee on Immunization Practices (ACIP). Our respective organizations wish to offer the following:

Since the Advisory Committee on Immunization Practices (ACIP) was formally established by the Surgeon General of the U.S. Public Health Service back in 1964, it has played an increasingly integral role in our health care system. Stakeholders ranging from health care providers, public health organizations, federal agencies and insurance plans rely upon the apolitical, expert, evidence-based advice and recommendations the ACIP provides on the use of immunizations among populations. These recommendations facilitate access and first dollar coverage for most Americans.

The ACIP, like the Food and Drug Administration (FDA), carefully evaluates the scientific evidence, but is unique in that it also takes a host of other important factors into consideration before making recommendations on who should (and should not) receive a particular vaccine, and at what intervals. Beyond vaccine safety and effectiveness, ACIP member experts also consider burden of disease, the cost of immunizing relative to disease burden, as well as many other important considerations that go into their recommendations and guidance.

The recent decision to abruptly dismiss all seventeen ACIP voting members days after providing official notice for the June meeting and hastily replacing eight of them with new members calls into question the nomination and vetting process. As organizations who closely follow the advice and recommendations of ACIP, we are deeply concerned by these recent events and the impact they will have on the integrity and credibility of the committee going forward. Transparency and public trust are of the utmost importance, and the rigorous scientific evidence-driven process and deliberative selection of individuals to serve based on expertise in vaccine-related fields have been hallmarks of the ACIP for over half a century.

Vaccines are one of the greatest advances in human health in modern history, saving untold millions of lives here in the United States and worldwide. In addition to preventing a staggering human cost of disease, vaccines have resulted in trillions of dollars in direct and indirect societal



savings<sup>1</sup>. We remain committed to protecting the health of the American public from the scourge of preventable infectious disease through the use of extensively studied vaccines that are thoroughly evaluated for use among the US population.

Sincerely,

Alliance for Aging Research

American Academy of Family Physicians

American College of Obstetricians and Gynecologists

American Lung Association

Asian & Pacific Islander American Health Forum

American Pharmacists Association

American Public Health Association

Big Cities Health Coalition

Gerontological Society of America

HealthyWomen

Immune Deficiency Foundation

Infectious Diseases Society of America

March of Dimes

National Consumers League

National Minority Quality Forum

Post-Acute and Long-Term Care Medical Association

Trust for America's Health

Vaccinate Your Family

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<sup>1</sup> <https://www.americanactionforum.org/research/vaccine-protection-and-productivity-the-economic-value-of-vaccines/>

