

June 20, 2025

RE: Public Comment for June 25-27, 2025 ACIP Meeting {**Docket No.** CDC-2025-0024}

On behalf of the National Association of County and City Health Officials (NACCHO), thank you for the opportunity to submit public comments for the June 2025 Advisory Committee on Immunization Practices (ACIP) meeting. The National Association of County and City Health Officials (NACCHO) is the voice of the over 3,300 local health departments across the country. Every day, local health departments are visible in the community working to keep their region safe, healthy, and economically productive. Local health departments play a key role in the immunization infrastructure, ensuring access to immunization, as well as timely, accurate, information that allows individuals to make informed health decisions. This is particularly important in rural areas, where local health departments fill gaps left by rural health care provider closures. Local health departments also prepare for and respond to public health crises that could be prevented by vaccines, like measles or hepatitis A outbreaks, helping to save lives, reduce suffering, and prevent costly health care expenditures.

Vaccine-preventable diseases cause long-term illness, hospitalization, and death, reducing economic prosperity and adding to the nation's health care costs. In recent years, vaccine-preventable diseases have resurged throughout the country, with notable increases in influenza, hepatitis A, mumps, polio, and measles. Though vaccination coverage rates remain relatively stable nationwide, data indicates that sociodemographic and geographic disparities persist across the lifespan, and there is a significant need for improvement in addressing these disparities.^{i,ii,iii} The outcomes of low immunization rates are financially and socially devastating. The CDC estimates that vaccines given to children born between 1994-2021 will prevent an estimated 472 million illnesses, 1,052,000 deaths, and \$2.2 trillion in total societal costs.^{iv}

NACCHO recognizes the importance of a national immunization recommendation strategy addressing all stages of life, aiming to increase overall immunization rates and subsequently reduce morbidity and mortality from vaccine-preventable diseases nationwide. NACCHO also supports efforts to ensure that immunizations are both accessible and affordable to individuals who choose to get vaccinated.

For example, maternal immunization is critical in protecting both pregnant women and their infants before they are born and within an infant's first months of life. Through immunizing individuals while

pregnant, newborns are protected against serious communicable diseases (such as influenza, pertussis, and tetanus) before they can be immunized.

Additionally, childhood vaccination has proven to be one of the most effective public health strategies to control and prevent diseases. To reduce childhood morbidity and mortality, the ACIP recommends routine vaccination of children by age 24 months against potentially serious diseases including hepatitis B, rotavirus, measles, pertussis, and mumps.^v Vaccination at this age greatly increases the chance children have antibodies before they are exposed to disease.

Immunizations in adult populations result in critical protection for older individuals and the population in general. Older adults and those with chronic health conditions are considered to be at high risk of contracting vaccine-preventable diseases and experience increased morbidity and mortality.^{vi} Otherwise healthy adults also benefit from immunizations when they avoid or have less severe cases of illness, such as flu, allowing for fewer missed days of work and enhanced quality of life.^{vii} A key intervention to improving adult immunization rates is increased education leading to awareness of the importance of immunizations for adults. Increasing access to immunizations in this population is also imperative.

ACIP recommendation ensures immunizations will be affordable to those with private health insurance, Medicaid, and Medicare.^{viii} Payment programs such as Medicaid and Medicare should prioritize their adult immunization activities to ensure that all adults have equal access to immunizations. Ongoing and potential future proposals to develop a comprehensive adult vaccine safety net program would also help to increase vaccine access for uninsured adults further improving vaccine equity and vaccination rates.

As the ACIP considers new and existing vaccine recommendations, we urge the Committee to reaffirm its commitment to scientific independence and to issue recommendations that expand access to immunizations to protect the public health across the lifespan. Further, as ACIP considers its membership, NACCHO strongly recommends the addition of voting members who have experience in local and state health department immunization programs to ensure fuller understanding of the impacts of ACIP's work on access and uptake at the community level. Thank you for the opportunity to provide comments.

Sincerely,



Lori Tremmel Freeman, MBA
Chief Executive Officer



-
- ⁱHill, H. A. (2023). Vaccination Coverage by Age 24 Months Among Children Born During 2018–2019— National Immunization Survey–Child, United States, 2019–2021. MMWR. Morbidity and Mortality Weekly Report, 72.
- ⁱⁱ Pingali, C. (2022). National vaccination coverage among adolescents aged 13–17 years—national immunization survey-teen, United States, 2021. MMWR. Morbidity and Mortality Weekly Report, 71. DOI: <http://dx.doi.org/10.15585/mmwr.mm7135a1>.
- ⁱⁱⁱ Centers for Disease Control and Prevention. (2022). Vaccination coverage among adults in the United States, National Health Interview Survey, 2019–2020.
- ^{iv} CDC. About the Vaccines for Children (VFC) Program. Retrieved June 2025, from <https://www.cdc.gov/vaccines-for-children/about/index.html>
- ^v Wodi AP, Murthy N, Bernstein H, McNally V, Cineas S, Ault K. Advisory Committee on Immunization Practices Recommended Immunization Schedule for Children and Adolescents Aged 18 Years or Younger — United States, 2022. MMWR Morb Mortal Wkly Rep 2022;71:234–237. DOI:
- ^{vi} Vaccinate Your Family. State of the Immunion (2019). Accessed May 2019. https://vaccinateyourfamily.org/wp-content/uploads/2019/11/SOTIReport_2019_FINALUpdated.pdf
- ^{vii} Blanchet Zumofen, M.H., Frimpter, J., Hansen, S.A. Impact of Influenza and Influenza-Like Illness on Work Productivity outcomes: a systematic literature review. PharmacoEconomics. 2023;41(3):253–73.
- ^{viii} Kates, J. ACIP, CDC, and Insurance Coverage of Vaccines in the United States. Accessed June 2025, from <https://www.kff.org/other/issue-brief/acip-cdc-and-insurance-coverage-of-vaccines-in-the-united-states/>