

Docket: CDC-2025-0024

Public Comment for the June 25-27, 2025, CDC ACIP Committee Meeting

To RFK Jr. and Members of the CDC ACIP committee:

I am a board-certified Family Physician with over 30 years of clinical experience. Over the last 24 years, I have served as a medical director for both public and private colleges student health centers. In this role, I have been responsible for preparing for and responding to potential public health crises, as do my fellow colleagues in college health. I have a detailed understanding of the role of vaccines and their role in keeping our campuses and those communities safe and healthy. In 2020, I led the public health response to safely reopen our campus of 7500 students, most of whom lived on campus. I write to this committee with no conflicts of interest to disclose.

Today, I am writing to express grave concerns about the recent termination of all 17 members of the CDC ACIP committee announced on June 9 by Robert F. Kennedy, Jr. These former members have an important role as independent expert scientists or clinicians on the ACIP committee with a crucial role in providing their understanding of the safety and efficacy of FDA-approved and authorized vaccines while also guiding insurance coverage and coverage for uninsured children through the Vaccines for Children program. Currently, vaccination rates for many infectious diseases are very low, and many communities across the US are directly affected by outbreaks of vaccine-preventable diseases such as measles, pertussis, and COVID. Many of these infections can cause serious and potentially lifelong consequences on their health. Children in 2025 should not die or become disabled from infectious diseases because of a lack of access to affordable and effective vaccines. COVID vaccines must be available to everyone and not be limited to only some people. I ask you, Mr. Kennedy, to preserve an independent decision process with CDC's ACIP and reverse the decision to remove the recent expert advisors and reverse the policies limiting access to COVID vaccines. Additionally, as has been the process in the past as it pertains to members of ACIP, any new members must disclose all financial and other conflicts of interest. ACIP must understand that currently available FDA-approved vaccines are safe and effective, and children, adults, and pregnant people all of whom rely on CDC ACIP vaccine recommendations for access to vaccines and insurance coverage.

RFK Jr., Marty Makary, and Vinay Prasad have recently established policies that limit access to COVID vaccinations. Creating such barriers is harmful to the public's health. Everyone must have regular access to updated COVID vaccines and widely available with full coverage by health insurance. The scientific evidence is irrefutable, and it is a waste of precious resources and time to conduct additional efficacy studies, which only serve to sow doubt in vaccines. Receiving a COVID vaccine within the last year reduces the risk of symptoms, severe disease, disability, and death for people of all ages, including previously healthy people. The new policies create barriers to access to COVID vaccines, limiting access for children, pregnant people, and adults under age 65. These restrictions also create immense confusion among the public on the usefulness of COVID vaccines. We ask you to take action, follow the evidence, and reinstate universal COVID vaccine recommendations for people of all ages, twice a year, for all COVID vaccine formulations.

Any changes to vaccine-related policies requires a science and evidence-based approach entailing an open, and transparent process. Similarly at the FDA, the VRBPAC committee members were faced with undue influence by the leadership of the FDA including Vinay Prasad. He made a decision for the VRBPAC committee before they had a chance to consider and share vaccine recommendations. This also happened with the Influenza vaccine strain selection, which occurred in a closed-door meeting without recommendations from the FDA VRBPAC committee members, and no opportunity for public consideration or comment. I beseech this committee to ensure that all vaccine policy decisions are considered, evaluated, and concluded using open and transparent processes, all of which are hallmarks of democracy.

As a member of the American College Health Association, I would also like you to review their position statement regarding the above concerns. I have included this for your review below.

Thank you for your consideration.

Joanne M. Clinch M.D.

## ACHA Statement on Changes to ACIP CDC

The American College Health Association (ACHA) is deeply troubled by the recent removal of all 17 sitting members on the U.S. Centers for Disease Control and Prevention's vaccine advisory panel, Advisory Committee on Immunization Practices (ACIP).

With the removal of these advisors and appointment of just eight new members, we are also concerned that ACIP will no longer have at its disposal the extensive public health and vaccine expertise on which it has relied for many years. This may compromise ACIP's capacity to provide credible, science- and data-driven vaccination guidance and risks undermining public trust, with serious implications for all communities, including college communities.

Since its inception 61 years ago, ACIP has been comprised of trusted experts who base their advice on sound science and data. ACHA urges ACIP to uphold its commitment to protecting public health, maintaining public trust, and providing vaccination recommendations that are evidence-based.

### **Why Vaccinations Matter**

Health and well-being are foundational to student success. Vaccines keep students healthy and thus engaged and on track in their academic studies—whether that's at a university, a community college, or a trade school.

College campuses are dynamic, intergenerational communities that include students, faculty, staff, and non-traditional students such as veterans, older learners, pregnant individuals, and students with underlying health conditions. These populations rely on robust public health measures to ensure their safety and continued access to education.

The overwhelming evidence in favor of immunization remains consistent, as approved vaccines are proven to be safe and efficacious for preventing disease.

Outbreaks of vaccine-preventable diseases, such as influenza, measles, mumps, meningitis, pertussis, polio, varicella, HPV, and COVID-19, have been mitigated for years—and decades in many cases—by strategies based primarily on the proactive deployment and administration of vaccines.

Following science-based vaccination recommendations is essential not only for protecting individual health but also for preserving the collective safety, stability, and accessibility of our nation's higher education institutions and the communities they serve.