



Nothing about us without us!

Ms. Stephanie Thomas,  
ACIP Meeting,  
Centers for Disease Control and Prevention,  
1600 Clifton Road NE, Mailstop H24-8,  
Atlanta, Georgia 30329-4027.

**Re: Docket No. CDC-2025-0024 for “Meeting of the Advisory Committee on Immunization Practices”**

The Autistic Self Advocacy Network (ASAN) is writing to express grave alarm at the radical shift in both the makeup and priorities of the Centers for Disease Control and Prevention (CDC)'s Advisory Committee on Immunization Practices (ACIP). ASAN is a national, autistic-led disability rights organization that serves autistic adults. We advocate for policies that support the needs of autistic individuals, including access to health care and support services that meet our needs, and to ensure that public policymaking includes the voices and addresses the needs of autistic individuals. Upon review of publicly available information about the recent ACIP appointees, as well as the ACIP meeting agenda for June 25th and 26th, ASAN has serious concerns that the Secretary and ACIP appointees are invested in a policy agenda intended to undermine effective vaccination practice, sow fear and misinformation about the safety of vaccines, and endanger both the Autistic community specifically, and public health for all of America broadly. We strongly urge the Secretary and the Committee to reverse course and cease their political interference in deliberative, evidence-based vaccine recommendations.

## Vaccines do not cause autism

Of particular concern to ASAN has been the published agenda for the ACIP meeting scheduled for June 25th and 26th. The published agenda removes several expected meeting topics, including updated COVID-19 vaccines for the coming year, and instead includes discussions of thimerosal in vaccines, as well as new recommendations for the MMR vaccine.<sup>1</sup> Thimerosal is an antiseptic, antifungal agent used as a preservative in multidose vaccines and other injectable drugs. Thimerosal is derived from ethylmercury, a rapidly-excreted mercury compound that does not bioaccumulate. Decades of extensive, peer-reviewed research have long established that thimerosal does not pose

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<sup>1</sup> CDC. (2025, June 18). ACIP Meeting Agendas. Advisory Committee on Immunization Practices (ACIP). <https://www.cdc.gov/acip/meetings/agendas.html>

a health risk and is not associated with the incidence of autism or any other neurodevelopmental disorders.<sup>2 3 4 5 6 7</sup>

The MMR vaccine has similarly been subject to false claims of association with autism incidence. The earliest versions of these claims date to a now-retracted 1998 study by Andrew Wakefield. Wakefield's study was retracted due to manipulated and falsified data as well as undisclosed conflicts of interest.<sup>8</sup> As with thimerosal, decades of exhaustive, peer-reviewed research have established an overwhelming scientific literature establishing that there is no association between the MMR vaccine and autism.<sup>9 10 11</sup>

## Discredited claims about vaccine components endanger autistic individuals.

These discredited claims alleging a link between vaccination and autism are not harmless. False claims of links between vaccines components and autism have figured directly into a wide range of purported autism “cures” that risk significant health harms.

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<sup>2</sup> Price CS, Thompson WW, Goodson B, Weintraub ES, Croen LA, Hinrichsen VL, Marcy M, Robertson A, Erisken E, Lewis E, Bernal P, Shay D, Davis RL, DeStefano F. Prenatal and infant exposure to thimerosal from vaccines and immunoglobulins and risk of autism. *Pediatrics*. 2010 Oct;126(4):656-64. Epub 2010 Sep 13.

<sup>3</sup> Thompson WW, Price C, Goodson B, Shay DK, Benson P, Hinrichsen VL, Lewis E, Eriksen E, Ray P, Marcy SM, Dunn J, Jackson LA, Lieu TA, Black S, Stewart G, Weintraub ES, Davis RL, DeStefano F, Vaccine Safety Datalink Team. Early Thimerosal exposure and neuropsychological outcomes at 7 to 10 years. *N Engl J Med*. 2007 Sept 27;357(13):1281-92.

<sup>4</sup> Alberto Eugenio Tozzi, Patrizia Bisiacchi, Vincenza Tarantino, Barbara De Mei, Lidia D'Elia, Flavia Chiarotti, Stefania Salmaso; Neuropsychological Performance 10 Years After Immunization in Infancy With Thimerosal-Containing Vaccines. *Pediatrics* February 2009; 123 (2): 475–482. 10.1542/peds.2008-0795

<sup>5</sup> Verstraeten, T., Davis, R. L., DeStefano, F., Lieu, T. A., Rhodes, P. H., Black, S. B., Shinefield, H., Chen, R. T., & Vaccine Safety Datalink Team (2003). Safety of thimerosal-containing vaccines: a two-phased study of computerized health maintenance organization databases. *Pediatrics*, 112(5), 1039–1048.

<sup>6</sup> Stehr-Green, P., Tull, P., Stellfeld, M., Mortenson, P. B., & Simpson, D. (2003). Autism and thimerosal-containing vaccines: lack of consistent evidence for an association. *American journal of preventive medicine*, 25(2), 101–106. [https://doi.org/10.1016/s0749-3797\(03\)00113-2](https://doi.org/10.1016/s0749-3797(03)00113-2)

<sup>7</sup> Ball, L. K., Ball, R., & Pratt, R. D. (2001). An assessment of thimerosal use in childhood vaccines. *Pediatrics*, 107(5), 1147–1154. <https://doi.org/10.1542/peds.107.5.1147>

<sup>8</sup>The Editors of The Lancet (2010) Retraction—Ileal-lymphoid-nodular hyperplasia, non-specific colitis, and pervasive developmental disorder in children The Lancet, 375(9713), 445. [https://doi.org/10.1016/S0140-6736\(10\)60175-4](https://doi.org/10.1016/S0140-6736(10)60175-4)

<sup>9</sup> DeStefano, F., & Shimabukuro, T. T. (2019). The MMR Vaccine and Autism. *Annual review of virology*, 6(1), 585–600. <https://doi.org/10.1146/annurev-virology-092818-015515>

<sup>10</sup> Gulati, S., Sharawat, I. K., Panda, P. K., & Kothare, S. V. (2025). The vaccine–autism connection: No link, still debate, and we are failing to learn the lessons. *Autism*, 0(0). <https://doi.org/10.1177/13623613251345281>

<sup>11</sup> Anders Hviid, Jørgen Vinsløv Hansen, Morten Frisch, et al. Measles, Mumps, Rubella Vaccination and Autism: A Nationwide Cohort Study. *Ann Intern Med*.2019;170:513-520. [Epub 5 March 2019]. doi:10.7326/M18-2101

These include the use of chelation agents— drugs which are used to treat actual cases of acute heavy metal poisoning. Even when used appropriately, these drugs have serious side effects, including heart and kidney damage. In at least one well-documented case, the inappropriate use of chelation as a purported autism cure for a child led to that child's death.<sup>12 13</sup> Far from mere precaution, the sorts of discredited claims that appear to be under discussion at the upcoming ACIP meeting directly contribute to the acceptance of unsupported and fraudulent treatments that have endangered and killed members of our community in the past.

## Vaccination is essential for protecting the health of autistic individuals.

The harms caused to the autistic community by vaccine misinformation is not limited to the direct harms of fraudulent and dubious treatments. Attacks on vaccine confidence endanger the lives of autistic individuals due to infectious disease. This was illustrated most starkly during the earliest years of the COVID-19 public health emergency, when IDD individuals, including autistic individuals, faced substantially heightened risk of severe illness and death.<sup>14</sup> In addition, many autistic individuals faced a dramatically heightened risk of infection due to high rates of living in congregate settings such as group homes and institutional settings.<sup>15</sup> Reduced adoption of vaccination population-wide puts autistic individuals at greater risk of severe illness and death from vaccine-preventable diseases. Vaccination is an essential tool for ensuring our health and safety, and we will be among the first populations to experience harm from undermined confidence in vaccines.

## The Secretary's false claims about Committee conflicts

The Secretary's justification for firing the Committee and replacing it alleges that the prior committee members had undisclosed conflicts of interest and that his intervention in committee membership was responsive to low public trust.<sup>16</sup> Yet, the latter claim is broadly untrue. Up until now, ACIP recommendations have enjoyed a broad level of

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<sup>12</sup> Baxter AJ, Krenzelok EP. Pediatric fatality secondary to EDTA chelation. Clin Toxicol (Phila). 2008 Dec;46(10):1083-4. doi: 10.1080/15563650701261488. PMID: 18949650.

<sup>13</sup> Offit, P (2015, March 20). Death of an Autistic Child From Chelation Therapy - Op-ed. The Children's Hospital of Philadelphia. <https://www.chop.edu/news/death-autistic-child-chelation-therapy-oped>

<sup>14</sup> Gleason, J., Ross, W., Fossi, A., Blonsky, H., Tobias, J., & Stephens, M. (2021). The Devastating Impact of Covid-19 on Individuals with Intellectual Disabilities in the United States. NEJM Catalyst, 2(2). <https://doi.org/doi: 10.1056/CAT.21.0051>

<sup>15</sup> Landes, S. D., Turk, M. A., Formica, M. K., McDonald, K. E., & Stevens, J. D. (2020). COVID-19 outcomes among people with intellectual and developmental disability living in residential group homes in New York State. Disability and health journal, 13(4), 100969. <https://doi.org/10.1016/j.dhjo.2020.100969>

<sup>16</sup> (2025, June 9). HHS Takes Bold Step to Restore Public Trust in Vaccines by Reconstituting ACIP. HHS.gov. <https://www.hhs.gov/press-room/hhs-restore-public-trust-vaccines-acip.html>

trust among physicians and patients<sup>17</sup>. Similarly, former ACIP committee members have discussed the exacting, years-long approval process for ACIP membership under prior administrations, vetting processes that are intended to identify and minimize potential conflicts. The process these members describe is a far cry from the recent ACIP changes undertaken by Secretary Kennedy. Several of the new ACIP appointees appear to have leadership roles in anti-vaccine advocacy organizations, which are not disclosed anywhere in public announcements<sup>18</sup>, while others appear to have little or no connection or expertise related to public health, vaccines, or immunology at all. Their rapid appointment within months of Secretary Kennedy's confirmation and only a week after former ACIP members were removed means that it is impossible for them to have completed an approval process of comparable comprehensiveness and rigor to those Kennedy removed. While ASAN will continue to monitor the committee's proceedings and disclosures to ensure that the committee is not abusing the trust it has enjoyed up until this point, the interference in ACIP's ordinary processes and radical opacity on display as to the backgrounds and credentials of its new membership fill us and our community with grave misgivings and apprehension about the new committee's fidelity to its core objective of providing evidence-based recommendations to support the control of vaccine-preventable diseases.

We thank you for the opportunity to submit these comments, and urge you once again to reverse course and cease political interference in deliberative, evidence-based vaccine recommendations. When discredited claims about vaccines and autism are promoted, members of our community are harmed and killed as a consequence. When false claims about the safety of vaccines are promoted, the entire American public is endangered, but autistic individuals more than most. We beg you not to abuse the trust America's physicians and families place in ACIP by turning it into a platform for lies.

Gregory Robinson  
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Autistic Self Advocacy Network

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<sup>17</sup> KFF Tracking Poll on Health Information and Trust: January 2025 | KFF. (2025, May 12). KFF. <https://www.kff.org/health-information-trust/poll-finding/kff-tracking-poll-on-health-information-and-trust-january-2025/>

<sup>18</sup> Asturias EJ, Brewer NT, Brooks O, et al. Advisory Committee on Immunization Practices at a Crossroads. JAMA. Published online June 16, 2025. doi:10.1001/jama.2025.10776