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

Attn: Docket No. CDC- 2025-0024.

The Association of State and Territorial Health Officials (ASTHO), a liaison organization to the Advisory Committee on Immunization Practices (ACIP), appreciates the opportunity to provide comment during the June 2025 ACIP committee meeting. As the nonpartisan national nonprofit organization representing state and territorial public health officials, ASTHO and its members recognize immunizations as one of the most cost-effective means of public health promotion and disease prevention.

State and territorial health departments help implement state laws on vaccination including school entry requirements and health care worker standards, as well as implementing immunization information systems that afford individuals and their providers access to vaccine records and support informed clinical decisions. These health departments also play a crucial role in ensuring children receive necessary vaccinations by administering the federally funded Vaccines for Children (VFC) program. Health departments partner with providers, community organizations, and private sector partners to ensure access to immunizations. And lastly, state health departments implement immunization campaigns and manage outbreak response to emerging health threats.

The expertise, deliberations, and recommendations of ACIP members are essential in providing information to the public, the broader healthcare community, and state and territorial health departments throughout the country. Nearly 600 statutes and regulations across 49 states, three territories, and the District of Columbia reference ACIP, underscoring the committee's critical role in shaping vaccine policy and public health practice. In addition, group health plans and health insurance issuers are generally required to provide coverage without imposing any cost-sharing requirements for vaccines recommended by ACIP. Given the critical role of states and territories in implementing applicable state laws, vaccination efforts in response to public health threats, and communicating about vaccinations, ASTHO provides the following comments for consideration:

1. **Ensure state and territorial health departments have representation on the ACIP committee.** States and territories are charged with delivering vaccinations for emerging health threats and implementing state immunization laws. Changes to vaccine schedules have downstream consequences for the public and the hundreds of local organizations including schools, day cares, pharmacies, and providers. As such, state and territorial health officials have an intimate understanding of the implementation of vaccine recommendations, the communication of recommendations to stakeholders, and the approaches which resonate in their local communities. Current and former state and territorial health

officials also have a range of backgrounds and expertise relevant to the work of ACIP and include pediatricians, OB/GYNs, and infectious disease specialists.

2. **Engage with ASTHO to help populate workgroups and the ACIP committee.** With an extensive network of former and current health officials, ASTHO stands ready to provide recommendations for subject matter experts that can participate in these important national conversations and meetings. In addition to ASTHO's primary membership of state and territorial health officials, ASTHO convenes an active network of over 200 former health officials, who are also able to contribute to conversations related to public health promotion and disease prevention.
3. **Include ASTHO and other liaison organizations in workgroup meetings between ACIP public meetings.** The work of ACIP members is not only accomplished during the formal meetings, but they also participate in workgroups that meet throughout the year to ensure members are up to date on specific vaccines and vaccine safety information by reviewing timely scientific study results and continually evaluating effectiveness and safety data. ASTHO has participated in prior such workgroups including the COVID-19 Vaccine and Mpox Working Groups, and we ask that ASTHO, and liaison organizations continue to be actively included in former and newly formulated workgroups going forward.
4. **Ensure transparent deliberation and processes for future vaccine recommendations.** The HHS announcement on May 27 to alter the childhood vaccination schedule in advance of the upcoming ACIP meeting created confusion among public health officials and the public. In addition, the decision to remove COVID-19 vaccine recommendations for pregnant women – a group considered high risk of severe disease – ahead of ACIP consideration was concerning. We appreciate the goal of restoring trust in vaccine policy, emphasize the need for transparent deliberation, and recognize the valued input of liaison organizations and the public as an important step in crafting recommendations that are trusted by the public and providers.

ASTHO has long served as a liaison member organization to ACIP. We look forward to continued opportunities to represent the viewpoint of state and territorial public health departments and provide expertise on how to implement vaccine recommendations.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Kanter".

Joseph M. Kanter, MD, MPH
Chief Executive Officer, Association of State and Territorial Health Officials