

June 20, 2025

Submitted electronically via Federal eRulemaking Portal: <https://www.regulations.gov> [Docket No. CDC-2025-0024]

Advisory Committee on Immunization Practices
Department of Health and Human Services, Centers for Disease Control and Prevention
1600 Clifton Road NE
Atlanta, Georgia 30329

RE: Comment on the Impact of Evidence-Based Practices That Inform ACIP Recommendations for Colleges and Schools of Pharmacy

Dear Advisory Committee on Immunization Practices Members:

On behalf of the nation's colleges and schools of pharmacy, the American Association of Colleges of Pharmacy (AACCP), write to express our strong support for the use of rigorous, transparent, and evidence-based decision-making in expert panel selections and the recommendations issued by the Advisory Committee on Immunization Practices (ACIP). The colleges and schools of pharmacy, representing thousands of faculty, staff, and student pharmacists across the United States, rely on ACIP's guidance to educate future pharmacists, shape public health outreach, and ensure pharmacists are equipped to provide safe, evidence-informed immunization services in their communities.

Pharmacists are one of the most accessible healthcare providers and play a pivotal role in immunization efforts nationwide. Our academic institutions educate student pharmacists using curricula and clinical training rooted in the latest ACIP recommendations. These recommendations directly shape how pharmacists are trained to evaluate vaccine eligibility, administer vaccines, and counsel patients across a wide range of settings, including community pharmacies, clinics, long-term care facilities, and student-run health events.

We offer specific examples that illustrate the integral role of ACIP guidance in the academic and clinical mission of pharmacy education:

- American Pharmacists Association (APhA) Pharmacy-Based Immunization Delivery Program
 - o APhA's [certificate training program](#), widely used by schools of pharmacy, is directly informed by ACIP recommendations. This program teaches student pharmacists how to apply evidence-based vaccine schedules, identify contraindications, and follow current guidance on immunization delivery and documentation. The curriculum aligns with CDC standards and is foundational in preparing student pharmacists to become confident and competent vaccinators.
- Incorporating 2024 RSV and COVID-19 ACIP Updates into Training
 - o Continuing pharmacy education (CPE) materials developed for pharmacy schools and training centers have incorporated the most recent 2024 ACIP recommendations on COVID-19 and RSV vaccines. CPE is especially critical for pharmacists renewing their licenses to practice. These updates are now part of the clinical immunization decision-

making coursework for student pharmacists and pharmacy technicians alike, reinforcing their ability to interpret evolving immunization schedules and apply them in real-world patient care.

- Fostering Trust in Pharmacists and the Communities They Serve
 - o Trust is the cornerstone of effective pharmacist–patient relationships: evidence shows that pharmacists are a primary trusted source for vaccine discussions and are uniquely positioned to combat hesitancy.

We must also express our concern in changes to recent vaccine policy changes. **If ACIP's integrity were compromised, pharmacists would face challenges justifying recommendations, and public trust could falter—leading to lower vaccine uptake, health disparities, and fragmented care.** In pharmacy education, consistency with ACIP recommendations is not optional—it is essential to ensure patient safety, uphold practice standards, and fulfill the public health mission of our institutions.

We thank you for your work and urge ACIP to reaffirm its commitment to data-driven, peer-reviewed processes that reflect the highest scientific and public health standards. The colleges and schools of pharmacy stand ready to partner in efforts to improve immunization education and expand equitable vaccine access.

Sincerely,



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