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Comments for Centers for Disease Control and Prevention [Docket No. CDC-2025-0024]

Meeting of the Advisory Committee on Immunization Practices

June 25-26, 2025

The Infectious Diseases Society of America is pleased to provide comments ahead of the June 25-26 meeting of the Advisory Committee on Immunization Practices (ACIP).

For more than 60 years, ACIP has played a critical role in preserving vaccine access for all Americans who want to be vaccinated and providing strong, scientific evidence-based information to enable clinicians to offer the highest quality care and empower individuals to make the best-informed decisions about their own health and their families' health.

IDSA is a global community of 13,000-plus clinicians, scientists and public health experts working together to solve humanity's smallest and greatest challenges, from tiny microbes to global outbreaks. On behalf of IDSA's members and the patients and communities they serve, we call for ACIP to continue its role as a reliable source of credible, evidence-based information to determine which vaccines should be covered under federal programs like Vaccines for Children and to determine guidelines for insurance coverage for vaccines.

After the Secretary of Health and Human Services (HHS) dismissed all 17 voting members of ACIP June 9, replacements were announced two days later. With a complete slate of new members on the committee, the process of planning the June meeting appears to have been rushed. There has not been time for the new members to adequately assess the surveillance data on vaccine-preventable diseases and review data on any new vaccines that would normally be shared by CDC staff to inform the committee's deliberations.

As the HHS Secretary has pointed out, transparency about conflicts of interest is essential. The committee has not made their conflict-of-interest disclosures to the public. This should be done prior to any action the ACIP would take since members with conflicts should recuse themselves from votes as necessary. Additionally, public statements by the HHS Secretary have inaccurately stated basic facts about the new ACIP appointees, including false information about medical and academic credentials. Several of the newly appointed members have benefited financially from litigation against vaccine manufacturers.



The agenda for the June meeting was announced only a few days before the deadline for written comments. There has been limited time for IDSA to review the agenda and develop comments, which has also limited the ability for IDSA's ACIP liaison members to prepare. It has also not been clear whether liaison members from medical societies will be included in this meeting, as required by the terms of their engagement.

June 2025 ACIP Agenda Items

IDSA strongly objects to the inclusion on the June meeting agenda of items that ACIP has already voted on at its April 2025 meeting, namely the recommendation for RSV vaccine for high-risk adults over age 50 and the pentavalent meningococcal vaccine. These recommendations should move forward without delay.

The vote to strengthen HPV vaccine recommendations, which has critically important ramifications for cancer prevention, was removed from the agenda. In addition, recommendations on COVID vaccines were scheduled to be brought up for a vote at this meeting, after a discussion in April but have also been removed from the agenda. IDSA objects to changes being made to COVID vaccine recommendations or any other vaccine recommendation without proper consideration and evaluation by vaccine experts.

IDSA also objects to including a vote on proposed recommendations regarding thimerosal containing influenza vaccines. Thimerosal is a mercury-based preservative only added in trace amounts to multidose influenza vaccine vials to prevent the growth of harmful bacteria and fungi that could contaminate the vaccine. Currently, only a limited number of flu vaccines contain thimerosal because it was eliminated from most vaccines in 1999. Extensive research has found no evidence of harm or a link to autism from the low levels of thimerosal currently included in vaccines; CDC and FDA have released multiple statements that thimerosal is not in any way linked to autism.

Please contact Eli Briggs, IDSA director of public policy, at ebriggs@idsociety.org with any questions about these comments.

