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June 20, 2025

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.

RE: June 25-26 Advisory Committee on Immunization Practices Meeting

Docket Management Staff,

The National Community Pharmacists Association (NCPA) represents America's community pharmacists, including 18,900 independent community pharmacies. Almost half of all community pharmacies provide long-term care services and play a critical role in ensuring patients have immediate access to medications in both community and long-term care (LTC) settings. Together, our members employ 205,000 individuals and provide an expanding set of healthcare services to millions of patients every day. Our members are small business owners who are among America's most accessible healthcare providers. NCPA submits these comments on behalf of both community and LTC independent pharmacies.

We are pleased that the work of the Advisory Committee on Immunization Practices (ACIP) is moving forward. ACIP's independent expert, evidence-based and timely review is how we maintain the integrity of the vaccine approval and recommendation process. We thank the members for their expertise and their time spent on this essential process.

Healthcare practice policies and payor coverage determinations are directly tied to ACIP recommendations. Pharmacists order and administer, in partnership with the healthcare community and public health, most of this country's adult vaccines with some estimate that pharmacists and pharmacy technicians administer up to 90%¹. Pharmacists' legal authority to achieve this public health service in most states is directly dependent on ACIP recommendations. Independent pharmacists provide a critical access point for vaccines, particularly in rural, underserved and long-term care settings.

We note that there is no vote scheduled on the COVID-19 Vaccine agenda item. We urge ACIP to review the evidence and vote on COVID-19 vaccinations, particularly on areas that have been changed on the recently published CDC schedules. As noted previously, pharmacists' legal authority to administer

¹ 1. *Trends in Vaccine Administration in the United States*. IQVIA. January 13, 2023. Accessed June 20, 2025.
<https://www.iqvia.com/insights/the-iqvia-institute/reports-and-publications/reports/trends-in-vaccine-administration-in-the-united-states>.

vaccines in most states is dependent on ACIP recommendations, not solely CDC issued immunization schedule/recommendations. In addition, healthcare providers depend on ACIP evidence-based guidance to serve the public health needs of their patients. Adding to the confusion and complexity is the current CDC recommendation conflicts with the position of ACOG and other professional organizations. Lastly, we worry that without ACIP recommendations, payor coverage of COVID-19 vaccines may be variable, and vulnerable populations may be compromised.

An example of the lack of clarity in the marketplace that has recently occurred for health care providers and payors is that ACIP's actions taken at the April 15-16, 2025 meeting has not had a MMWR published and was not included in the CDC schedule released on May 29, 2025. However, new recommendations, not voted on by CDC were on the schedule released on May 29, 2025. Once an ACIP vote is taken, we urge CDC to review and publish the MMWR in a timely manner as has been done historically for health care providers and public confidence and health to be optimized.

NCPA thanks CDC for the opportunity to provide feedback, and we stand ready to work with the agency to offer possible solutions and ideas. Please let us know how we can assist further, and should you have any questions or concerns, please feel free to contact me at Ronna.Hauser@ncpa.org or 703-838-2691.

A handwritten signature in black ink that reads "Ronna B. Hauser". The signature is fluid and cursive, with the first name "Ronna" being the most prominent part.

Ronna Hauser, PharmD

Senior Vice President, Policy and Pharmacy Affairs
National Community Pharmacists Association