



california **pharmacists** association

Public Comment Submission to the CDC's Advisory Committee on Immunization Practices (ACIP)

The California Pharmacists Association (CPhA) represents thousands of pharmacists, pharmacy technicians, and student pharmacists across all pharmacy practice settings, including community, health-system, ambulatory care, specialty, long-term care, public health, managed care, and more throughout California.

As the largest state pharmacy association in the nation, CPhA submits this public comment with urgency and strong conviction in support of the CDC's Advisory Committee on Immunization Practices (ACIP) and its indispensable role in shaping science-based vaccine policy and protecting public health. The recent dismissal of all ACIP members by HHS Secretary Robert F. Kennedy Jr. is a politically motivated action that undermines six decades of rigorous scientific process and endangers the integrity of immunization recommendations relied upon nationwide.

ACIP recommendations are not merely academic. They are foundational to pharmacy practice and have direct implications for patient access and insurance coverage.

Pharmacists across the country are authorized immunizers, administering millions of doses annually in accordance with ACIP schedules. These recommendations are used by the **Centers for Medicare & Medicaid Services (CMS), state Medicaid programs, and private insurers** to determine vaccine coverage and reimbursement. They are also integral to the **Vaccines for Children (VFC)** program, ensuring that low-income and underserved pediatric populations receive vaccines without financial barriers.

In California, pharmacists are often the most accessible health care providers, especially in underserved and rural communities. We rely on ACIP to guide evidence-based recommendations and ensure harmonized practices across settings and populations. ACIP's removal directly threatens patient care, especially for vulnerable groups such as pregnant individuals, children, and immunocompromised patients.

We join the Governors of California, Oregon, and Washington in condemning this disruption of scientific process and urge the CDC to uphold ACIP's legacy of expert, transparent, and independent decision-making. Public trust must be earned through credible evidence, not dismantled by political agendas.



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CPhA calls on the CDC to:

- Reinstatement of a science-based, conflict-free ACIP members immediately.
- Reaffirm the use of ACIP recommendations as the national standard for vaccine coverage and clinical practice;
- Protect access to COVID-19 and other ACIP-recommended vaccines for all eligible individuals, including those enrolled in Medicaid, Medicare, and the VFC program.

We urge the CDC to stand firm in its mission to protect the health of all Americans by restoring the scientific foundation of its immunization policy process.

Chief Executive Officer

California Pharmacists Association