



June 20, 2025

Centers for Disease Control and Prevention

Attention: Ms. Stephanie Thomas, ACIP Meeting

1600 Clifton Road NE, Atlanta, Georgia 30329-4027

RE: Docket No. CDC-2025-0024 Meeting of the Advisory Committee on Immunization Practices

Dear Advisory Committee on Immunization Practices:

Alameda County Health in California respectfully submits these comments regarding the process for making vaccine recommendations in the United States. For more than sixty years, the Advisory Committee on Immunization Practices (ACIP) has applied independent scientific expertise to recommend the dose, age, and interval at which individuals should receive vaccines based on careful review of high-quality evidence. ACIP recommendations have long supported the prevention and control of communicable diseases in the United States and, by extension, in Alameda County. **Strong ACIP policies and procedures and clear, evidence-based guidance are especially important at a time of increasing spread of, and morbidity from, vaccine-preventable diseases such as measles, pertussis, and influenza.**

The expert recommendations provided by ACIP inform coordinated vaccination policies at the national, state, and local level, thereby protecting the health of Alameda County residents and all Americans. The clarity, reliability, and continuity of ACIP's expert recommendations are essential to vaccine manufacture, insurance coverage, distribution, and, therefore, access. ACIP's evidence-based vaccine recommendations benefit the whole population by reducing the impacts of vaccine-preventable disease and are especially critical to the health of those at elevated risk of severe consequences, including infants, pregnant people, immune-compromised people, and seniors.

We urge ACIP to publicly consider the following key points when deliberating vaccine recommendations for the COVID-19, influenza, respiratory syncytial virus, measles-mumps-rubella-varicella vaccines and others at the Committee's June 2025 meeting:

1. The substantial health and financial costs of vaccine-preventable illness.
2. The substantial evidence for the safety and effectiveness of vaccines currently recommended by ACIP across a range of populations and outcomes.
3. The potential barriers to vaccination that could result from disruptions to insurance coverage and the Vaccines for Children program, particularly for low-income Americans and those with immune-compromising conditions.
4. The impacts of barriers to vaccine access for health workers, which could impact the health care workforce and contribute to communicable disease exposures for vulnerable patient groups.

Finally, we request that ACIP continue to have transparent processes for appointments and for review of high-quality evidence to inform vaccine recommendations. Throughout its history, ACIP has carefully weighed the complex scientific, clinical and practical factors impacting vaccine use, helping Americans




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access these important tools to protect their health and preventing countless cases of debilitating illness. Although ongoing, thoughtful reviews and updates of vaccine policy are needed, ACIP members must continue to apply a cautious and un-biased review of both proposed and already-established vaccine guidance such that trust is maintained in vaccine policy decisions with the potential to broadly impact American's health.

We are grateful to the experts who have served on ACIP and supported evidence-based vaccine recommendations improving public health for more than sixty years.

Sincerely,

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Director, Alameda County Health

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