



ACIP Secretariat
Centers for Disease Control and Prevention
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Attn: Docket No. CDC-2026-0199

Dear Dr. Zadeh and ACIP Members:

The Adult Vaccine Access Coalition (AVAC) appreciates the opportunity to submit written comments in advance of the upcoming Advisory Committee on Immunization Practices (ACIP) meeting on March 18-19.

AVAC includes eighty organizational leaders in health and public health who are committed to overcoming the barriers to adult immunization and to raising awareness of and engaging in advocacy on the importance of adult immunization. Our mission is informed by scientific and empirical evidence that shows that immunization improves health, protects lives against a variety of debilitating and potentially deadly conditions, and saves costs to the healthcare system and to society.

ACIP's recommendations form the foundation for several policies across the U.S. healthcare system, including guidance for providers and patients on who should receive certain vaccines and at what intervals, and determining first dollar health insurance coverage of vaccines. These recommendations are also widely linked to provider authority as well as billing and reimbursement in various healthcare settings and insurance types. The February 26, 2026 Federal Register notice indicates that the ACIP March 2026 meeting could include recommendation vote(s) on "ACIP recommendation methodology. **As such, AVAC would like to take this opportunity to reiterate our support for an ACIP process that honors guiding principles based in expertise, evidence-based practices, and transparency.**

Expertise. ACIP is a public-facing, transparent committee established by Congress. ACIP members who are nominated to serve should be selected based on their ability to provide expert perspectives and advice on the use of vaccines in the U.S. population. ACIP serving members participate in working groups that carefully review the scientific evidence and deliberate specific questions and topics that inform the ACIP decision making process. For more than 50 years, ACIP's recommendations have shaped the landscape for vaccine access. The work of the ACIP should be firmly grounded in apolitical, expert, evidence-based guidance and recommendations on the use of vaccines.

Evidence-Based Practices. ACIP recommendations have always been a gold standard, trusted source because they are informed by thoughtfully structured evaluations, the Grading of Recommendations Assessment, Development, and Evaluation (GRADE) system and by the Evidence to Recommendation (EtR) processes. The GRADE process rates the quality of evidence used in the development and evaluation of healthcare recommendations. The EtR process allows the ACIP to consider the balance of benefits and harms, the type and quality of evidence, implementation considerations, and relevant health economic analyses. Consistent use of these frameworks has allowed for robust deliberation around complex issues and must continue to be the basis of all ACIP work.

Transparency. Transparency is also a critical element of the ACIP deliberation process. For members of the general public to be educated participants in ACIP convenings, meeting agendas and related materials must be made available more than 24 hours in advance. Releasing materials, including presentations, to the public ahead of time assures transparency and supports greater public confidence in the ACIP deliberations and its ultimate decision making on vaccine recommendations. ACIP recommendations have a significant impact on the availability, administration, payment, and demand for vaccines by Americans and a sustained commitment to transparent, evidence-based practices is crucial.

COVID-19 Injuries and Long COVID. The February 2026 notice also indicates that ACIP members could be voting on items related to COVID-19 Injuries and Long COVID. Both topics are extremely important, and in the spirit of transparency, members of the public deserve access to more information on the specific topics and questions that will be considered in advance of the meeting. It is difficult, if not impossible, for the general public to give thoughtful and informed comments to this advisory body without it.

COVID-19 Injuries. ACIP members should carefully weigh rare COVID vaccine injuries against the many demonstrated benefits of the vaccine to populations at risk of severe illness, hospitalization and premature mortality.

Long COVID. Long COVID is a complex and poorly understood condition that deserves greater attention from the scientific and medical community. In an effort to better understand the multiple, confounding factors that comprise long COVID for patients affected by the condition, the National Academies of Sciences, Engineering, and Medicine (NASEM) convened a committee to examine the literature on this condition and receive information directly from those with lived experience. In 2024, the NASEM committee issued a report as well as a new consensus definition for long COVID. This report provides a good example of the multidisciplinary collaboration and expertise needed to support advancements in knowledge and support patients living with long COVID. It is also important to acknowledge the value of vaccination in reducing risk of acute illness and subsequently potential for long COVID impacts.

Changes in vaccine recommendations, done without comprehensive and unbiased evaluation of the evidence, expertise and transparency that has informed these

recommendations could have effects across the life course. Changes in the vaccine schedule inevitably change access to desired vaccinations; these changes can have a positive or negative impact. They have the potential to ease or disrupt availability, create or dissipate uncertainty around whether or not a vaccine is appropriate for a particular person, or if that person has coverage for a certain vaccine. Health insurance plans have looked to ACIP recommendations to provide clarity on which vaccines should be covered for different population age groups and best practices for access. ACIP deliberations and decision making can benefit the public's health through clear recommendations, or it can weaken confidence and protections against costly and avoidable illness.

We call on ACIP to rely on scientifically rigorous, evidence-based data, with a transparent process, when making vaccine recommendations. Thank you for the opportunity to share these views.