To: Food and Drug Administration, Dockets Management Staff
From: The Adult Vaccine Access Coalition (AVAC)
RE: Vaccine and Related Biological Product Advisory Committee Meeting
DATE: March 11, 2026

The Adult Vaccine Access Coalition (AVAC) appreciates the chance to provide comments in advance of the upcoming Vaccine and Related Biological Product Advisory Committee (VRBPAC) meeting on March 12, 2026.

Docket No. FDA-2026-N-0826 for "Vaccines and Related Biological Products Advisory Committee; Notice of Meeting; Establishment of a Public Docket; Request for Comments – United States (U.S.) 2026-2027 Influenza Vaccine Strain Composition.

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.

The decision process by which VRBPAC undertakes and the standards the committee uses to select the strain for the seasonal influenza vaccine will be critical to ensure that Americans are best protected from seasonal influenza. This decision is the first of many that the Food and Drug Administration (FDA) will make to ensure that the vaccine supply operates in a timely manner to produce the best possible tools to promote our healthy longevity and prevent illness and death during the next influenza season. It will also contribute to the rapid availability of safe and effective flu vaccines which have been shown to reduce costs to the U.S. economy and healthcare system. A recent study found that influenza cost the U.S. economy nearly $29 billion and contributed to more than 27,000 adult deaths during the 2023–24 flu season.[1]

As VRBPAC prepares to select the strain composition of influenza virus vaccines for use in the United States during the 2026-2027 influenza season, members of the AVAC wish to express our support for a process at the FDA that honors guiding principles based on transparency and stability, expertise, and evidenced-based standards.

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[1] https://www.medrxiv.org/content/10.64898/2025.12.23.25342685v1

Transparency and Stability. Transparency and stability are a vital part of the VRBPAC's selection process. As the committee has operated in the past, VRBPAC should release materials in advance, including presentations, to support greater public confidence in VRBPAC's final strain selection. The FDA has also announced that the agency may release a new framework for the FDA vaccine review process, inserting significant uncertainty at a crucial moment in the vaccine development process and therefore could delay the availability of vaccines. We strongly support processes that are clear and reduce uncertainty to ensure that vaccines are developed and evaluated in a scientifically rigorous manner and on time.

Expertise. VRBPAC is a public-facing, transparent committee established by Congress with members who ensure that new vaccines meet scientific and safety standards before reaching the public. The work of the VRBPAC should be grounded firmly in apolitical, expert, evidence-based advice on vaccine development.

Evidence-Based Standards. The VRBPAC's standards related to strain selection and clinical trials have continued to be evidence-based to best protect Americans from seasonal flu. Consistent use of these frameworks has allowed for safe and effective vaccines to be developed on an annual basis and must continue to be the foundation for all VRBPAC's work.

We urge the members of VRBPAC to continue to rely on scientifically rigorous, evidence-based data, with a transparent process, when making decisions on the strain selections for influenza vaccines for the 2026-2027 season.

Thank you again for the opportunity to comment.