



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: May 21, 2026

The Adult Vaccine Access Coalition (AVAC) appreciates the opportunity to provide comments in advance of the upcoming Vaccine and Related Biological Product Advisory Committee (VRBPAC) meeting on May 28, 2026.

Docket No. FDA-2026-N-3962 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 Formula for COVID–19 Vaccine 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 process VRBPAC undertakes and the standards the committee uses to select the 2026-2027 COVID-19 vaccines will be critical to ensure that Americans have timely access to a range of vaccine technology platforms during the upcoming respiratory season. The Food and Drug Administration’s (FDA’s) actions have a direct impact on whether the vaccine supply, across a set of technologies and next-generation vaccine platforms, will be available in a timely manner. Additionally, COVID-19 vaccines have been shown to reduce costs to the U.S. economy and healthcare system. Studies have shown that the U.S. investment in testing, buying, and delivering the first COVID-19 vaccines had a greater return on investment in the first year when accounting for the cost of testing and treating for COVID-19 and productivity costs.¹ Additional studies found that in more recent COVID-19 seasons, vaccines reduce hospitalization, ICU use, long-term

¹ The cost-effectiveness of vaccination against COVID-19 illness during the initial year of vaccination. <https://www.sciencedirect.com/science/article/pii/S0264410X25000222>.

disability like long COVID, and death and generates net economic savings, including in productivity.^{2,3}

As VRBPAC prepares to select the strain composition of COVID-19 vaccines for use in the United States for the 2026-2027 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.

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 formula selection. 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 COVID-19. 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 COVID-19 vaccines for the 2026-2027 season.

Thank you again for the opportunity to comment.

² Cost-Effectiveness of 2023-2024 COVID-19 Vaccination in US Adults.
<https://jamanetwork.com/journals/jamanetworkopen/fullarticle/2837339>

³ <https://www.news-medical.net/news/20250814/Study-shows-economic-benefits-of-continued-COVID-19-vaccination.aspx>