



September 12, 2025

Via Regulations.gov
Docket No. CDC-2025-0454
Advisory Committee on Immunization Practices (ACIP)
Centers for Disease Control and Prevention (CDC)

Dear ACIP Secretariat and Committee Members,

On behalf of the National Health Council (NHC), thank you for the opportunity to provide comments in advance of the September 18–19, 2025 meeting. ACIP's recommendations play a pivotal role in shaping patient access, and public comment is important before scheduled votes, including those that affect coverage.

Created by and for patient organizations over 100 years ago, the NHC convenes organizations from across the health ecosystem to forge consensus and drive patient-centered health policy. We promote increased access to affordable, high-value, comprehensive, accessible, and sustainable health care. Made up of more than 180 national health-related organizations and businesses, the NHC's core membership includes the nation's leading patient organizations. Other members include health-related associations and nonprofit organizations including the provider, research, and family caregiver communities; and businesses and organizations representing biopharmaceuticals, devices, diagnostics, generics, and payers.

We respectfully request the ACIP and CDC build on their current practices by focusing on the following key areas:

- **Conflict of Interest Safeguards:** Continue to rigorously apply existing CDC standards, requiring full public disclosure of financial and professional interests, and ensuring recusals are documented and honored where appropriate. Visible enforcement of these protections is essential to maintaining public trust in immunization policy.
- **Clear Evidence-Based Standards:** We recognize and appreciate that ACIP and the CDC continue to use the GRADE (Grading of Recommendations, Assessment, Development, and Evaluations) and EtR (Evidence to Recommendation) frameworks, which are widely accepted, international standards for developing transparent, evidence-based recommendations. To further enhance public trust, we recommend that you consistently communicate how these frameworks guide your final recommendations. Publishing concise, publicly accessible rationales that explain how data quality, clinical outcomes, and real-world effectiveness informed each vote would help patients, caregivers, and clinicians understand the basis for your decisions.

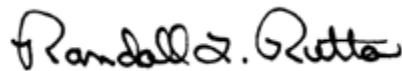
- **Plain-Language Communication:** Releasing plain-language summaries is vital. These summaries should clearly explain who should receive each vaccine, why, when, and where. It is also particularly important to provide tailored information for people with chronic conditions, disabilities, and those who are immunocompromised. Ensuring consistent messaging across all CDC web pages and with partner communication channels is also important.
- **Timely Patient Access and Coverage:** Reaffirm timely coverage and access by coordinating with payers to prevent gaps between recommendations and patient access, reducing administrative barriers, and monitoring implementation for communities that face the greatest obstacles to care.

The NHC appreciates ACIP's essential role in protecting public health. We support a transparent, independent, and evidence-based process that results in clear, trusted recommendations and reliable coverage for all people who need vaccines. We also remain ready to partner with CDC to provide our members and the patients, caregivers, and families they educate and assist with clear, evidence-based information.

Please contact Kimberly Beer, Senior Vice President, Policy & External Affairs at kbeer@nhcouncil.org or 202-557-9146 with any questions or request for additional information.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Randall L. Rutta". The signature is written in a cursive, flowing style.

Randall L. Rutta
Chief Executive Officer