



Association of  
Immunization  
Managers

Public Comment  
Meeting of the Advisory Committee on Immunization Practices  
April 15-16, 2025  
Federal Register Docket No. CDC-2025-0017

April 10, 2025

Members of the Committee,

The Association of Immunization Managers (AIM), a 501(c)(3) nonprofit member organization that supports the program managers of the 64 federally funded immunization programs across the 50 states, 8 U.S. territories and freely-associated states, and 6 major U.S. cities, would like to extend its thanks to the members of the ACIP and its work groups for the important work you undertake to make recommendations that are based upon the latest and most trustworthy data available at the time. Since its establishment in 1964, the expert members of the ACIP have reviewed, discussed, and debated the research, data, costs, and benefits of recommending vaccines for public use. Their process is transparent, potential conflicts of interest are appropriately disclosed and reconciled, and their recommendations are informed by their collective expertise in vaccine science and infectious diseases. Committee members, as well as work group members and liaisons, volunteer their time to do this critical work because they believe in the mission of protecting the public from infectious diseases that can be prevented through vaccines and vaccine-like products.

Among the topics of discussion during this meeting is a review of the data around reducing the number of recommended doses of Human Papillomavirus (HPV) vaccine. This is the second time the ACIP has reviewed research and data to consider *eliminating* a dose of this highly effective vaccine. In 2016, the ACIP voted to reduce the number of HPV vaccines administered to children ages 9-14 from three doses to two doses. Nine years later, the Committee will discuss the evidence supporting further reducing the recommendation to just one dose for some populations and reducing the recommendation from three doses to two doses for other populations. The Committee's willingness to review these data and consider recommendations to eliminate vaccine doses is an important example of the members' dedication to providing evidence-based recommendations that inform the Centers for Disease Control's (CDC's) recommended vaccine schedules. Similarly, past recommendations of the ACIP resulted in the elimination of an influenza B strain from seasonal influenza vaccines (2024), a change in polio vaccine recommendations from the oral, live virus vaccine to the safer, injected, inactivated polio vaccine (2000), and removal of the Rotashield vaccine against rotavirus due to a safety issue that was identified through the CDC's Vaccine Adverse Event

Reporting System (VAERS) (1999). The work of the ACIP not only provides important recommendations for the prevention of infectious diseases but also protects the public from unnecessary or potentially harmful vaccine products.

AIM looks forward to the continued work of the ACIP, the transparency of its decision-making process, and the expertise it provides to professionals across public health and healthcare. The work of these highly experienced and knowledgeable Committee members is critical to the health and wellbeing of all Americans.

Sincerely,

A handwritten signature in black ink, appearing to read "Michelle D. Fiscus". The signature is fluid and cursive, with a prominent initial "M" and "F".

Michelle D. Fiscus, MD FAAP  
Chief Medical Officer