



Association of  
Immunization  
Managers

**Docket Number: CDC-2025-0024**

## **Statement of the Association of Immunization Managers in Support of Maintaining a Stringent, Science-Based Process for the Advisory Committee on Immunization Practices**

The Association of Immunization Managers (AIM) is a nonprofit membership organization whose members direct the public health immunization programs in the 64 federally funded jurisdictions (50 states, 8 territories or federated states and 6 large cities). The vision of AIM is a nation free of vaccine preventable disease. AIM members work every day to assure that vaccines are accessible to all populations, that outbreaks of disease are contained, and that people and providers are educated about the benefits and risks of vaccines.

The Advisory Committee on Immunization Practices (ACIP) plays a critical role in the activities of AIM and our ability to succeed in reaching our vision. For jurisdictions, ACIP guidelines are instrumental in shaping immunization policies, laws and regulations, as well as informing the operation of state and local immunization programs. They also guide insurance coverage decisions, such as those for Medicaid and CHIP programs, ensuring consistent access to recommended vaccines.

We are writing today to recognize the value of ACIP and to urge transparency, engagement of non-voting liaisons, and ongoing review and analysis through expert working groups. ACIP has built trust with the public in the following ways:

**Transparency and Public Input:** The open meetings, opportunities for public comment, and the eventual publication of recommendations in the Morbidity and Mortality Weekly Report (MMWR) underscore a commitment to transparency and accountability. This openness builds trust and allows for public understanding of the scientific rationale behind vaccine guidance.

**Conflict of Interest Safeguards:** The longstanding stringent conflict of interest policies for ACIP members, including financial disclosures and recusal requirements, are crucial for maintaining the integrity and impartiality of the committee's work.

**Work Groups:** The ACIP work groups are the bedrock of informed immunization policy. The work groups conduct ongoing reviews of published and unpublished data and have the unique ability to synthesize complex information into actionable recommendations. It is through these dedicated work groups that the initial, in-depth scientific evaluations occur, ensuring that when a topic reaches the full committee, it has already undergone a comprehensive and expert

examination. The inclusion of diverse expertise within these groups, often including ACIP members, CDC staff, and invited consultants, ensures a multi-faceted and thorough approach to each vaccine or immunization topic.

**Liaisons:** Non-voting ACIP liaisons from various professional organizations and academic societies provide invaluable, real-world perspectives, clinical insights, and a broad understanding of public health implementation challenges to the discussions. Their ability to bridge the gap between scientific recommendations and practical application is essential for creating guidance that is not only scientifically sound but also feasible and impactful for healthcare providers and the public alike. Liaisons provide expertise in areas such as projected supply, incorporation into existing information technology (IT) systems (e.g., electronic health records and provider payment plans), impact on existing age-based medical intervention schedules, and capacity of providers and state and local health agencies to effectively store, distribute, and administer vaccines.

The ACIP is the cornerstone of public health in the United States and its territories, providing critical direction to the nation's immunization strategies and trusted guidance to the healthcare providers, policymakers, and the public. **The core of ACIP's value is its meticulous, science-driven process and rigorous, transparent, evidence-based approach.** Without the stringent process governing ACIP recommendations, immunization efforts would lack a unified, scientifically sound foundation, leading to fragmented healthcare provider practices and the inevitable reduction of vaccine uptake.

We urge the committee to return to the inclusion of expert working groups and non-voting liaisons and to maintain transparent and strict conflict of interest safeguards.

