



Association of  
Immunization  
Managers

## Public Comment to the Advisory Committee on Immunization Practices (ACIP)

March 12, 2026

The Association of Immunization Managers (AIM), a non-partisan, tax-exempt 501(c)(3) member organization representing the 66 federally funded immunization programs, appreciates the opportunity to provide public comment in advance of the March 18-19, 2026, meeting of the Advisory Committee on Immunization Practices (ACIP). Our members are responsible for the frontline implementation of national, state, local, and territorial vaccine policy, and we remain committed to ensuring all individuals have access to life-saving vaccines through a stable and predictable public health infrastructure.

As the Committee deliberates potential recommendations that will impact national immunization schedules, we urge a steadfast commitment to the following principles:

- **Adherence to the [ACIP Charter](#):** The Committee must operate within its defined scope, providing advice and guidance to the CDC Director regarding the use of vaccines for the effective control of vaccine-preventable diseases in the U.S. civilian population.
- **Reliance on Standardized Evaluation Frameworks:** National policy should be informed exclusively by a rigorous, transparent evaluation of scientific data using established methodologies. We strongly advocate for the consistent use of the [Grading of Recommendations, Assessment, Development, and Evaluation \(GRADE\)](#) approach to assess the certainty of evidence. The [Evidence to Recommendations \(EtR\)](#) framework should be fully utilized to synthesize evidence across key domains, including benefits, harms, and health economic analyses.
- **Prioritization of Peer-Reviewed Science:** It is essential that recommendations be based on peer-reviewed, high-quality scientific literature rather than personal anecdotes or unsubstantiated claims. Personal narratives, while important for individual clinical interactions, do not provide the necessary statistical power or methodological rigor required to inform national public health policy.
- **Adherence to the [Gold Standard](#) of Science:** Parents and healthcare providers rely upon credible science for vaccine confidence. This standard was defined in Executive Order issued by the White House on May 23, 2025, and refers to “science conducted in a manner that is reproducible, transparent, communicative of error and uncertainty, collaborative and interdisciplinary, skeptical of its findings and assumptions, structured

for falsifiability of hypotheses, subject to unbiased peer review, accepting of negative results as positive outcomes; and without conflicts of interest.”

- **Consistency and Implementation:** Abrupt or non-evidence-based changes to the immunization schedule create significant administrative and clinical barriers. Predictability in recommendations is vital for state and local programs to manage vaccine supply, provider education, and public communication.

AIM urges the ACIP to resume its long-standing role as an expert-driven, science-based advisory body. This commitment is the foundation of public trust and the primary safeguard against the resurgence of preventable diseases.

Sincerely,

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Association of Immunization Mangers