



**Comments to the Advisory Committee on Immunization Practices (ACIP)  
Centers for Disease Control and Prevention (CDC)  
March 18 – 19  
Docket ID: CDC-2026-0199**

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The National Consumers League (NCL) is America’s oldest consumer advocacy organization, dedicated to advancing consumer protections in healthcare, food safety, child labor, and privacy. NCL advocates for access to more affordable healthcare, including policies that increase public access to and confidence in vaccines and other forms of preventive health measures. It is in continuing to fulfill that work that we submit these comments to ACIP.

NCL continues to urge the Committee to ensure all recommendations are grounded in high-quality science and proven safety and efficacy, as established through FDA approval of vaccines and decades of usage. However, given Secretary Kennedy’s repeated rhetoric undermining vaccination and HHS’s recent actions – including changes to the childhood vaccine schedule that were not grounded in high-quality scientific evidence – NCL is deeply concerned that ACIP will take additional steps that limit consumer choice and access to FDA-approved vaccines.

As ACIP reconsiders its methodology for reviewing vaccines, it is essential that the Committee base its recommendations on a transparent, evidence-based process, and not ad hoc anecdotes or selective studies. ACIP has historically relied on the Grading of Recommendations Assessment, Development, and Evaluation (GRADE) framework and the Evidence to Recommendation framework to ensure that vaccine recommendations are based on rigorous scientific evaluation and a clear assessment of benefits, risks, feasibility, and public health impact. Maintaining these frameworks is imperative to ensuring that vaccine policy decisions are consistent, evidence-driven, and clearly communicated to the public. Reliance on a reputable methodology is also key to preserving trust in ACIP’s recommendations by stakeholders, including payors, healthcare providers, and patients.

In addition, NCL is concerned that the ACIP agenda includes a discussion on COVID-19 vaccine injuries and Long COVID. The COVID-19 vaccination campaign represents one of the most significant public health successes in modern history, helping prevent millions of deaths and dramatically reducing the risk of hospitalization and severe disease around the world.<sup>1</sup> Continued access to the COVID-19 vaccine is imperative to preserving consumer choice and ensuring that individuals, including those at higher risk, can continue to benefit from these vaccines. In addition, any discussions and votes on

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<sup>1</sup> [Lives saved by COVID-19 vaccines - PMC](#)

the COVID-19 vaccine should reflect today's realities, including the current formulations and latest safety data, rather than pandemic-era concerns that have since been addressed.<sup>2</sup> Promoting falsehoods or unsupported claims about the safety of these vaccines, including potentially no longer recommending mRNA vaccines that have been reviewed extensively by FDA,<sup>3</sup> undermines public confidence and runs counter to the fundamental public health goal of preventing disease. It also could impact insurance coverage of these vaccines, significantly limiting consumer choice and access. Finally, discussions of Long COVID extend beyond ACIP's vaccine recommendation mandate and would be more appropriately addressed through broader scientific and clinical forums.

Beyond these substantive concerns, NCL is deeply troubled by the lack of transparency surrounding ACIP meetings. The *Federal Register* notice and CDC website do not provide sufficient detail about the ACIP workgroup updates that will be presented or the language of any recommendation votes under consideration. Without this information, it is extremely difficult for the public to meaningfully prepare for meetings or provide informed input. Adequate advanced notice and clear background materials are essential to ensuring transparency and meaningful public engagement in ACIP's decision-making process.

NCL appreciates the opportunity to provide input on these important issues. As ACIP considers future recommendations, it is critical that the Committee remain firmly committed to transparent, evidence-based processes and the rigorous scientific standards that have long guided vaccine policy in the United States.

Sincerely,

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<sup>2</sup> [CIDRAP Op-Ed: The COVID vaccine myocarditis signal was real but is now resolved. ACIP's March agenda pretends otherwise. | CIDRAP](#)

<sup>3</sup> [RFK Jr.'s vaccine advisers drop proposal to revisit covid-19 shot - The Washington Post](#)