



**Comments to the Advisory Committee on Immunization Practices (ACIP)
Centers for Disease Control and Prevention (CDC)
September 18 – 19, 2025 Meeting
Docket ID: CDC-2025-0454**

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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 would 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 appreciate the opportunity to submit these comments to the Committee.

NCL urges the Advisory Committee on Immunization Practices (ACIP) to ensure its vaccine recommendations are grounded in medical science and proven safety and efficacy, as established through FDA approval of the products and decades of vaccine usage.

Vaccine recommendations should always be informed by the guidance of leading experts in the field. At a time of heightened public scrutiny, declining immunization rates, and growing distrust in federal health institutions caused by those who have continued to challenge longstanding evidence of efficacy and safety, it is essential for the health of the American public, and most importantly for America's children, that ACIP decisions are based in science and advance the protection of public health.

Vaccines and the work of this Committee have been the topic of significant national attention, shaped by the COVID-19 pandemic, measles outbreaks earlier this year, and changes within ACIP and CDC staff. It is crucial, now more than ever, to preserve the strength and integrity of our highly successful immunization system and infrastructure. The United States has continued to see a decline in immunization rates for preventable diseases¹, in part because of a decline in confidence and a growing distrust of public health systems². That decline has been sown in part by the anti-vaxx movement that thrives in an environment where longstanding facts and science are called into question on social media, on the dark web, and that are part of a larger conspiracy theory mindset.

This decline is lamentable, because for decades we have kept our children healthy and safe with vaccinations for multiple infectious diseases that used to kill or disable

¹ [Vaccination Coverage and Exemptions among Kindergartners | CDC](#)

² [Kindergarten Routine Vaccination Rates Continue to Decline | KFF](#)

children. My uncle contracted polio and spent his life in a wheelchair. NCL's founder, born in 1859, lost multiple siblings to diphtheria and other diseases that are simply unknown to Americans today because of vaccines. It's worth remembering that the great President Abraham Lincoln lost two sons to diseases for which children can now be immunized against – one from tuberculosis at nearly 4 years old, and another to typhoid at 11. The heartbreak remained with Mr. Lincoln and his wife for the remainder of their lives.

We never want to return to those dark days. Misinformation must be countered through trusted messengers and experts in the field. Without them, consumers across the nation are left confused about where to get accurate, scientifically backed data and recommendations to guide their decision making. ACIP has always, and must continue to play that role. In addition, to rebuild public trust, it is imperative that ACIP publicly document the scientific evidence behind any recommendations, negative or positive and listen to medical societies, including the American Academy of Pediatrics (AAP), the American Medical Association (AMA), and the Infectious Diseases Society of America. Just as no one would want to be operated on by a layperson with no medical training, we must not rely on those without medical education or those who are far out of step with established medical experts.

With that in mind, NCL has significant concerns about potential changes to the childhood vaccine schedule at the September committee meeting. The existing childhood vaccine schedule is firmly grounded in decades of rigorous scientific evidence and has been critical in reducing and, as noted above, eliminating, deadly diseases in the United States. Altering the schedule has serious real-world consequences: insurance coverage and school entry requirements are generally tied to ACIP recommendations. Weakening or politicizing the schedule could create gaps in coverage, reduce access for families, and place an additional financial burden on parents seeking to protect their children.

Altering the childhood vaccine schedule also risks sowing further confusion about vaccines for parents and caregivers. In the short time since the Food and Drug Administration's change in approval for COVID-19 vaccines for children, parents across the country are confused as to what they should be doing to best protect their children, with polling showing nearly half of parents saying they don't know whether or not federal agencies are recommending the COVID-19 vaccine for children.³ We are concerned that changes to the childhood vaccine schedule will cause greater confusion among parents and could put children and their communities at risk.

In addition, ACIP should re-invite the aforementioned medical associations, AAP, AMA and the Infectious Diseases Society of America, to participate in developing vaccine recommendations. These professional societies are home to experts in their respective fields and are viewed by consumers as highly trusted messengers.⁴ Their continued

³ [Poll: While Most Adults Do Not Expect to Get a COVID-19 Shot This Fall, Those Who Want One Worry About Access and Insurance Coverage | KFF](#)

⁴ [KFF Tracking Poll on Health Information and Trust: COVID-19 Vaccine Update | KFF](#)

participation as a resource within ACIP is essential – not only to strengthen the Committee’s work with scientific expertise, but also to help safeguard the process from undue political influence, conspiracy theories, or personal agendas.

Equally important, ACIP should actively consider aligning with the recommendations of these medical societies, including for COVID-19 vaccines. Alignment in recommendations from public health institutions and medical societies minimizes the risk of contradictory messaging between the government and trusted doctors, ensuring that patients and consumers receive clear, consistent, and scientifically grounded information.

NCL appreciates the opportunity to share our views on these issues and urges ACIP to remain firmly focused on advancing the Committee’s mission of protecting the health of the nation’s children and adults.

Sincerely,

Sally Greenberg
Chief Executive Officer
National Consumers League