



**Comments to the Advisory Committee on Immunization Practices (ACIP)
Centers for Disease Control and Prevention (CDC)
December 4 – 5, 2025
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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 ACIP.

ACIP's recommendations are critical in ensuring that consumers have access to vaccinations for preventable health conditions, including in forming the basis of insurance coverage and any cost sharing consumers may face in accessing them. NCL continues to urge the Committee to ensure all recommendations are grounded in science and proven safety and efficacy, as established through FDA approval of the products and decades of vaccine usage. NCL also urges the Committee to ensure that its recommendations continue to support inclusion of all routinely recommended childhood vaccines in the Vaccines for Children program, preserving no-cost access and enabling parents to make informed choices about their children's immunizations.

Vaccine recommendations should always be informed by the guidance of leading experts in the field, and combating misinformation requires trusted voices to deliver clear and accurate information. Without them, consumers across the nation are left confused about where to get accurate, scientifically backed recommendations to guide their decision making. ACIP has always and must continue to play that role. At a time of heightened scrutiny, declining immunization rates, and growing distrust in federal health institutions fueled by efforts to undermine well-established evidence on vaccine safety and effectiveness, it is more important than ever that ACIP's decisions remain firmly rooted in science and focused on protecting 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. Most recently, changes to the CDC's stance on vaccines and autism – counter to scientific evidence and the long-standing consensus on the lack of a link between them – has thrust vaccines and the childhood immunization schedule even further into the spotlight.

It is crucial that ACIP 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 diseases,¹ in part because of a decline in confidence and a growing distrust of public health systems.² 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. 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 children. The harm that can come from a preventable, infectious disease due to the lack of vaccination is tremendous and stays with families. We must never return to those dark days. And with the level of access to information individuals now have, it is important that the Committee continues to function as a respected, evidenced-based body.

With that in mind, NCL has significant concerns about the Committee's decision to discuss the childhood vaccination schedule at the December 2025 meeting. The existing childhood vaccine schedule is firmly grounded in decades of rigorous scientific evidence and has been critical in reducing and eliminating deadly diseases in the United States. Altering the schedule has serious real-world consequences. Recommendations from the Committee impact nearly all payers and insurance options, private and public, and have the potential to change the no-cost coverage consumers across America now expect when it comes to vaccination. In addition, school entry requirements are generally tied to ACIP recommendations. Weakening or politicizing the schedule could create gaps in coverage, reduce access and choice for families, and place an additional financial burden on parents seeking to protect their children.

Changes to the childhood vaccine schedule also risk sowing further confusion about vaccines. Earlier this year, we saw parents across the country struggle with the decision to vaccinate their children because of the FDA's change in approval for COVID-19 vaccines for children. Polling showed that nearly half of parents said they didn't know whether 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.

Finally, NCL has concerns surrounding the discussions, and any subsequent votes, on both adjuvants and the Hepatitis B vaccine. Any changes would lead to a lack of choice for consumers and has the potential to greatly strain the healthcare system. The delay for consumers, due to the need to develop new vaccines, either without specific adjuvants or for a later in life hepatitis B vaccine, will greatly increase the risk to adults, children and communities across the country.

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.

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

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

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](#)

Sincerely,

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