

June 20, 2025

**Comments to the Advisory Committee on Immunization Practices (ACIP)**

**June 25-26, 2025 Meeting**

**Docket No. CDC-2025-0024**

**Agency: Centers for Disease Control and Prevention (CDC)**

The [Gerontological Society of America](http://www.geron.org) (GSA) honors aging across the life course and is the nation's oldest and largest interdisciplinary organization devoted to research, education, and practice in the field of aging. The principal mission of the Society — and its 6,000+ members — is to advance the study of aging and disseminate information among scientists, decision-makers, and the public. Our mission is to cultivate excellence in interdisciplinary aging research and education to advance innovations in practice and policy. We encourage interdisciplinary research collaboration and communication. We routinely convene stakeholders to discuss issues of importance and make recommendations to address the specific needs of older people.

Since the ACIP was formally established by the Surgeon General of the U.S. Public Health Service in 1964, it has played an increasingly integral role in our health care system. Stakeholders ranging from health care providers, public health organizations, federal agencies and insurance plans rely upon the apolitical, expert, evidence-based advice and recommendations the ACIP provides on the use of immunizations among populations. These recommendations facilitate access and first dollar coverage for most Americans.

The ACIP, like the Food and Drug Administration (FDA), carefully evaluates the scientific evidence, but is unique in that it also takes a host of other important factors into consideration before making recommendations on who should (and should not) receive a particular vaccine, and at what intervals. Beyond vaccine safety and effectiveness, ACIP member experts also consider burden of disease, the cost of immunizing relative to disease burden as well as many other important considerations that go into their recommendations and guidance.

The recent decision to dismiss all seventeen ACIP voting members days after providing official notice for the June meeting and replace eight of them with new members calls into question the nomination and vetting process. We are concerned by these recent events and the impact they will have on the integrity and credibility of the committee going forward. Transparency and public trust are of the utmost importance, and the rigorous scientific and evidence-based driven process and deliberative selection of individuals to serve based on expertise in vaccine-related fields have been hallmarks of the ACIP for over half a century.

Vaccines are one of the greatest advances in human health in modern history, saving untold millions of lives here in the United States and worldwide. In addition to preventing a staggering human cost of disease, vaccines have resulted in trillions of dollars in direct and indirect societal savings (Baker, 2025). We remain committed to protecting the health of the American public from preventable infectious diseases through the use of extensively studied vaccines that are thoroughly evaluated for use among the American population.

Since 2010, GSA has been dedicated to bringing an interdisciplinary team together to increase reverence for vaccines. Our nation has experienced major increases in longevity since 1900 due to improvements in public health. We need to recall the importance of these life-saving vaccines and recognize the reverence with which they should be regarded.

Through our [National Adult Vaccination Program \(NAVP\)](#), we have:

- Collaborated with the multidisciplinary community of interest community.
- Produced informative summits, publications, and webinars.
- Advocated for policies that increase access to vaccines.
- Taught champions to increase vaccination rates.

Now, we aim to broaden the dialogue about vaccines from the narrow focus of an individual health benefit offering protection against a single target condition to the far-reaching value to the individual and society. Through our initiative, Concentric Value of Vaccination as We Age, we seek to illuminate individual health benefits (e.g., increased life expectancy, prevention of exacerbation of preexisting conditions) and societal health benefits (e.g., prevention of antibiotic resistance) along with individual and societal economic benefits.

We thank the committee for its continued efforts to protect the public and promote public health. For additional information, please contact Patricia D'Antonio, Vice President of Policy and Professional Affairs at [pdantonio@geron.org](mailto:pdantonio@geron.org), or Jordan Miles, Director of Policy, at [jmiles@geron.org](mailto:jmiles@geron.org).

Sincerely,

A handwritten signature in black ink that reads "James C. Appleby". The signature is written in a cursive, flowing style.

James C. Appleby, BSPHarm, MPH, ScD (Hon)  
Chief Executive Officer

#### **References**

Baker, M. (2025, June 5). *Vaccine Protection and Productivity: The Economic Value of Vaccines* - AAF.  
AAF. <https://www.americanactionforum.org/research/vaccine-protection-and-productivity-the-economic-value-of-vaccines/>