



March 11, 2026

Jay Bhattacharya, MD, PhD
Centers for Disease Control and Prevention (CDC)
Advisory Committee on Immunization Practices (ACIP)
1600 Clifton Road NE, Mailstop H21-12
Atlanta, Georgia 30329
Attn: Docket No. CDC-2026-0199

Dear Dr. Bhattacharya:

On behalf of the American College of Physicians (ACP), we are pleased to share our feedback on vaccine recommendations. The College is the largest medical specialty organization and the second-largest physician group in the United States. ACP members include 163,000 internal medicine physicians, related subspecialists, and medical students. Internal medicine physicians are specialists who apply scientific knowledge and clinical expertise to the diagnosis, treatment, and compassionate care of adults across the spectrum from health to complex illness.

Scientific Development, Regulatory Stability, and Evidence-Based Decision-Making are Under Threat

The U.S. vaccine development and regulatory infrastructure faces unprecedented challenges that threaten both innovation and public health preparedness. Recent policy changes have disrupted decades of scientific progress while undermining the evidence-based frameworks that have guided vaccine recommendations since the 1960s.

Altering the U.S. vaccine schedule to mirror Denmark's model is not an appropriate or evidence-based comparison. Denmark has a population roughly equivalent to New York State, operates under a universal health care system with reliable access to preventive services, and has a relatively homogeneous population profile. The United States, by contrast, has more than 330 million residents, lacks universal health coverage or consistent access to care, and encompasses a highly diverse population with distinct epidemiologic patterns and demographic considerations. These substantial differences necessitate vaccination policies specifically designed for the U.S. public health landscape. Decisions regarding vaccine schedules should therefore be grounded in U.S.-specific epidemiology, access realities, and population health needs rather than arbitrarily aligning with another country's program.

Erosion of Evidence-Based Vaccine Recommendations

The **Advisory Committee on Immunization Practices (ACIP)**, which has existed since 1964 to advise on vaccine use in the U.S. civilian population, has experienced a systematic dismantling of its evidence-based processes. **All**

ACIP committee members were summarily removed on June 9, 2025, and replaced with members having strong ties to the anti-vaccine movement.

The ACIP's decision-making framework represents decades of methodological refinement:

- The **GRADE (Grading of Recommendations Assessment, Development and Evaluation) framework**, formally adopted in 2010, ensures vaccine recommendations are based on systematic evidence review with transparent evaluation of evidence quality.
- The **Evidence to Recommendation (EtR) framework**, adopted in 2018, adds structured evaluation of implementation factors, costs, feasibility, stakeholder perspectives, and equity.

These frameworks were specifically designed to improve transparency and consistency following the 2008-2011 Institute of Medicine reports calling for stronger clinical guideline development methods.

Current ACIP discussions include updates on workgroups and potential votes on recommendations regarding COVID-19 vaccine injuries and Long-COVID methodology. **ACIP should reaffirm that its recommendation methodology remains grounded in the formal GRADE and EtR frameworks**, rejecting any methodology changes that would permit recommendations without documented evidence assessment and completed EtR review. Any reconsideration of methodology must be fully documented in public materials with a clear explanation of how revised processes will maintain evidence-based standards.

Compromised Data Systems and Transparency

Vaccine safety surveillance data is being altered or withheld without explanation, while funding for vaccine confidence research [has been cut](#).¹ Simultaneously, efforts to revive debunked claims linking vaccines to autism are being funded, contradicting decades of scientific evidence. Growing attempts to access personally identifiable health data without transparency or stakeholder engagement are a breach of public trust.

The convergence of these changes—defunded research, altered regulatory processes, dismantled advisory structures, and compromised data systems—represents a departure from the evidence-based, transparent decision-making that has characterized U.S. vaccine policy and enabled decades of life-saving innovation.

Additionally, the FDA has experienced significant workforce reductions that will delay new product development and potentially compromise safety inspections. More concerning are recent procedural changes that bypass established regulatory processes:

- A **Vaccines and Related Biological Products Advisory Committee (VRBPAC) meeting in February 2025** addressing influenza vaccine strain selection was canceled and replaced with a closed-door, unannounced meeting.
- **FDA's Director of the Center for Biologics Evaluation and Research resigned** following these changes.
- **New regulatory requirements for COVID-19 vaccines** now mandate placebo-controlled trials in healthy individuals despite more than 270 million Americans being previously immunized, a requirement that goes beyond standard regulatory practice.

- **Vaccine recommendations were announced via social media** rather than through formal CDC channels, bypassing the agency responsible for approving vaccine recommendations.

These actions undermine regulatory consistency, transparency, and the involvement of expert decision-makers—all essential conditions for public trust.

The American College of Physicians respectfully asks that the CDC postpone this meeting until it can ensure the American Public that all its decisions are transparent and consistently following evidenced based practices.

Conclusion

The College appreciates the opportunity to offer our feedback and looks forward to continuing to work with the agency to implement policies that support and improve the practice of internal medicine. Please contact Brian Outland, Ph.D., Director, Regulatory Affairs for the American College of Physicians, at boutland@acponline.org or (202) 261-4544 with comments or questions about the content of this letter.

Sincerely,

A handwritten signature in black ink that reads "Jason M Goldman". The signature is written in a cursive style and is contained within a thin black rectangular border.

Jason M Goldman, MD, FACP
President, American College of Physicians