



September 12, 2025

Martin Kulldorf, PhD  
Chair, Advisory Committee on Immunization Practices  
U.S. Centers for Disease Control and Prevention  
1600 Clifton Road NE  
Atlanta, GA 30329-4027

RE: CDC-2025-0454

Dear Dr. Kulldorf,

On behalf of the nearly 60 million American adults and 300,000 children living with arthritis, the Arthritis Foundation appreciates the opportunity to submit public comments for the upcoming meeting of the Advisory Committee on Immunization Practices (ACIP).

As the nation's leading nonprofit organization dedicated to the prevention, control, and cure of arthritis, we advocate for policies and practices that protect and improve the health of people living with autoimmune and inflammatory conditions. Immunization plays a critical role in safeguarding this vulnerable population, many of whom are immunocompromised due to their disease or treatment regimens. We urge ACIP to uphold its previous commitments to evidence-based recommendations and appreciate the opportunity to provide input on vaccine policies that directly impact the arthritis community.

### **Ensuring Vaccine Guidance Reflects the Needs of Immunocompromised Populations**

Those living with chronic inflammatory or autoimmune diseases like arthritis face higher risks of infection and death from viruses than the general population. Viral infections and resulting complications can be significantly reduced or even entirely prevented by vaccination. Immunizations, like those for measles, mumps and rubella, are critical for children and adults living with chronic conditions to prevent outbreaks that cause hospitalizations, severe illness and increased rates of death. These vulnerable populations also rely on herd immunity to ensure protection from preventable diseases, which is why broad population vaccination is so important.

As such, it is critical that ACIP's recommendations and clinical guidance explicitly consider the needs of immunocompromised populations, including those undergoing immunosuppressive treatment. We respectfully urge the Committee to ensure that vaccination schedules are grounded in scientific evidence, developed transparently, and implemented consistently.

### **Recent Terminations of Vaccine Requirements**

The Arthritis Foundation is deeply concerned about recent proposals<sup>i</sup> to eliminate vaccine requirements at the state level, including those tied to school enrollment. These policy shifts risk undermining decades of progress in public health and could leave immunocompromised individuals vulnerable to preventable diseases. In this



context, ACIP's role in issuing clear, science-based national vaccine recommendations becomes even more critical. Further, at least 18 states and the District of Columbia base the authority of pharmacists to administer vaccines on ACIP recommendations. Consistent federal guidance helps ensure that state and local policies remain grounded in evidence and prioritize the safety of those most at risk.

The Arthritis Foundation stands ready to collaborate with ACIP and other stakeholders to ensure that vaccine policies reflect the lived experiences of people with autoimmune and inflammatory conditions. We thank the committee for its work and welcome future opportunities to contribute to this vital public health mission. Should you have any questions and we can be of assistance, please contact Hayley Dempsey, Federal Affairs Manager at [hdempsey@arthritis.org](mailto:hdempsey@arthritis.org) or Anna Hyde, Vice President of Advocacy and Access, at [ahyde@arthritis.org](mailto:ahyde@arthritis.org) or 202-843-0105.

Sincerely,

A handwritten signature in black ink that reads "Anna Hyde".

Anna Hyde  
Vice President of Advocacy and Access  
Arthritis Foundation

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<sup>i</sup> Arthritis Foundation. *Vaccine Accessibility for Americans with Arthritis*. Available at: <https://www.arthritis.org/news/press-releases-and-statements/vaccine-accessibility-americans-arthritis>