

**ge<sup>2</sup>p<sup>2</sup> global**

governance, ethics, evidence, policy, practice

12 March 2026

ACIP Secretariat  
 Advisory Committee on Immunization Practices  
 Centers for Disease Control and Prevention  
 1600 Clifton Road NE  
 Atlanta, Georgia 30329

**RE: CDC-ACIP Meeting of 18-19 March 2026 :: Docket No. CDC 2026-0199**

Dear ACIP Secretariat Members:

On behalf of the GE2P2 Global Foundation and its Center for Vaccine Ethics and Policy, we are pleased to engage the public comment mechanism to address aspects of the meeting of the CDC's Advisory Committee on Immunization Practices (ACIP) on March 18–19, 2026.

For reference, GE2P2 Global is an integrated non-profit foundation/501[c]3 and public benefit corporation affiliate founded in 2016 to advance scientific rigor, ethical resilience, and integrity in research and evidence generation across the sciences – informing governance, policy, and practice. The Foundation's Center for Vaccine Ethics & Policy was launched in 2006 to engage the full life cycle of issues around global immunization and vaccines. Among other programs, the Center publishes *Vaccines and Global Health: The Week in Review* – a comprehensive weekly digest aggregating strategic news, events, announcements, peer-reviewed literature and other research in the global vaccine ethics and policy space.

As we draft this public comment late afternoon on March 12 -- the final day submissions will be accepted – we are distressed that the ACIP meeting agenda has still not been posted. The details of the *actual* discussions to be held, a reasonable indication of the posture on the issues raised and clarity on the votes that will *actually* be taken are all critical to developing public comment that is actually relevant to the docket.

We do not find that the Federal Register Notice of the meeting and the text as below addresses this concern.

*Matters to be Considered:* The agenda will include updates on ACIP Workgroups and discussions on COVID-19 vaccine injuries and Long-COVID and ACIP recommendation methodology. Recommendation votes may be scheduled for COVID-19 vaccine injuries and Long-COVID and ACIP recommendation methodology.

Insofar as the “ACIP recommendation methodology” topic and potential vote is engaged, and will address evidence review and evaluation processes, and evidence to recommendation processes, we urge ACIP members to review the expression of concern we issued in September 2025 [presented in Appendix A below]:

**[Expression of Concern: US CDC-ACIP: Commitment to Rigorous Evidence Evaluation and Vaccine Recommendation Processes](#)** – 25 Sep 2025

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**In summary, the GE2P2 Global Foundation calls on HHS/CDC/ACIP to issue full ACIP meeting agendas for future meetings in a time window that, at a minimum, tracks with the opening date of the public comment period.**

**Anything less compromises and confounds the whole purpose of public comment in this critical decision making process.**

Thank you for your consideration of these observations and call-to-action. I am happy to respond to any questions on the above.

Sincerely,



David R Curry, MS

Executive Director

Center for Vaccine Ethics & Policy

President & CEO

GE2P2 Global Foundation - Governance, Evidence, Ethics, Policy, Practice

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## Appendix A

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#### **Expression of Concern**

### **US CDC-ACIP: Commitment to Established Rigorous Evidence Evaluation and Vaccine Recommendation Processes Issued 25 Sep 2025**

:: The ACIP (Advisory Committee on Immunization Practices) plays a critical advisory role in evaluating evidence and developing recommendations which impact immunization policy and immunization schedules in the U.S.

:: Beginning in 2010, the ACIP adopted and has formally used rigorous evidence evaluation methodologies [GRADE - Grading of Recommendations Assessment, Development and Evaluation] and evidence-to-recommendation [EtR] frameworks in its work.

:: At the ACIP meetings in June and September 2025, it was clear that these long-established GRADE evidence evaluation and evidence-to-recommendation [EtR] processes were not utilized across much of the content presented and the recommendations considered.

:: Both meetings included key presentations – including by ACIP members and work group chairs -- anchored on content which had clearly *not* been evaluated under GRADE approaches, and advocated for policy and vaccine recommendations which did not proceed from established evidence-to-policy framework approaches [key example].

:: ACIP liaison organizations – including the American College of Physicians [ACF], the National Foundation for Infectious Diseases [NFID], and the Society for Adolescent Health and Medicine [SAHM] – voiced the concerns above at a number of points over during these two ACIP meetings. Specifically, the ACIP chair was asked multiple times to commit to these rigorous processes to ensure that ‘all the harms, benefits, acceptability, and feasibility are considered, with input from practicing clinicians and liaisons, in order to make informed decisions.’

:: The ACIP chair’s responses to these requests ranged from ignoring the substance of the questions to referencing his “trust” in CDC staff to various overtly dismissive comments [see YouTube meeting recordings Day 1, Day 2]. Declining to commit to these long-established evidence evaluation methodologies {GRADE} and evidence-to-policy frameworks is highly concerning.

:: The ACIP website has not posted any clarification of the ACIP’s chair’s multiple election to not commit, or any confirmation of ACIP’s commitment to these long-established processes for evidence evaluation and evidence-to-policy framework processes.

:: This situation compromises the integrity of current and future ACIP deliberations and, most important, its recommendations involving vaccine policy and immunization schedules, in particular those recommendations approved during the June and September 2025 meetings.

**The GE2P2 Global Foundation calls on HHS/CDC leadership and the ACIP Secretariat to immediately confirm that long-established evidence evaluation [GRADE] and evidence-to-**

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policy recommendation processes will be uniformly and rigorously applied to all content and inform all considerations at future ACIP meetings.

Further, we recommend that these processes be applied retrospectively to presentations from the June and September 2025 meetings and their outcomes.

Finally, we reiterate the observations and concerns articulated in our public comment submission regarding the September ACIP meeting.

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**ACIP Meeting Documentation**

**[ACIP Meeting September 18-19, 2025](#)**

- [Final ACIP September 18-19, 2025 Meeting Agenda \(posted 9-19-2025\)](#)
- [Anticipated Votes](#)
- [ACIP Presentation Slides: September 18-19, 2025 Meeting](#)
- [YouTube Live Stream Link 9-18-2025](#)
- [YouTube Live Stream Link 9-19-2025](#)
- [Written Public Comments \[5,145 comments submitted\]](#)

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The **GE2P2 Global Foundation** is an integrated non-profit foundation/501[c]3 and public benefit corporation affiliate founded in 2016 to advance scientific rigor, ethical resilience, and integrity in research and evidence generation across the sciences – informing governance, policy, and practice.

The Foundation has a strong record of responding to public comment and public consultation opportunities globally to strengthen and refine the development of laws, regulations, standards, policies, and guidance, and in support of other deliberative processes involving scientific rigor, research ethics and integrity. These calls are issued from organizations in the United Nations system, multilateral agencies, governments and country regulatory bodies, non-governmental organizations, civil society organizations, academic institutions, professional societies, and commercial organizations.

This Expression of Concern is one of a series where the Foundation takes note of and urges mitigating responses to actions taken by organizations as listed above which we assess to challenge, compromise or confound scientific rigour, ethics, or integrity.

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