

November 24, 2025

SUBMITTED ELECTRONICALLY
<https://www.regulations.gov>

ACIP Secretariat
Centers for Disease Control and Prevention
Department of Health and Human Services
Attention: CDC-2025-0783
Mailstop H21-12
1600 Clifton Road NE
Atlanta, Georgia 30329-4027

RE: Meeting of the Advisory Committee on Immunization Practices (December 4-5, 2025)

Dear Advisory Committee on Immunization Practices (ACIP) Secretariat and ACIP Members:

The American Geriatrics Society (AGS) greatly appreciates the opportunity to submit comments on the upcoming meeting of the Advisory Committee on Immunization Practices (ACIP) within the Centers for Disease Control and Prevention (CDC) scheduled for December 4-5, 2025. AGS is a not-for-profit society devoted to improving the health, independence, and quality of life of all older adults. Our 6,000+ members include geriatricians, geriatrics nurse practitioners, social workers, family practitioners, physician associates, pharmacists, and internists who are pioneers in serious illness care for older individuals, with a focus on championing interprofessional teams, eliciting personal care goals, and treating older people as whole persons. AGS is an anti-discriminatory organization. We believe in a society where we all are supported by and able to contribute to communities and where bias and discrimination no longer impact healthcare access, quality, and outcomes for older adults and their care partners. AGS advocates for policies and programs that support the health, independence, and quality of life of all of us as we age.

AGS is committed to ensuring that federal policy impacting the health of older Americans, including vaccination schedule, is informed by geriatrics health professionals who have the clinical and scientific expertise that is needed to guide development of healthcare policies that serve all of us as we age. We believe vaccines are essential to preventing and reducing the impact of infectious diseases on older adults considering our immune systems weaken as we age. These impacts can include exacerbation of chronic diseases, acceleration of disability (e.g., prolonged hospital stay for pneumonia could result in decreased mobility and increased need for assistance with activities of daily living), or hastening the death of older Americans. It is critically important that ACIP, as the federal advisory committee to the CDC that is making clinical recommendations on vaccines for children, adults, and older adults, have access to the specialized expertise of our members.

Work groups established by ACIP which have historically included non-voting organizational liaisons with scientific and clinical expertise to consider published and unpublished evidence on vaccine efficacy and safety are pivotal to ACIP's development of recommendations as to which vaccines should be on the

vaccination schedules for children and adults, including older adults. AGS is deeply concerned that excluding specialized expertise of organizational liaisons to inform ACIP's recommendations will result in a decline in the health and well-being of all Americans. We remain committed to ensuring that the vaccination schedule is based on available scientific evidence and focused on protecting all of us from infectious diseases as we age.

We urge CDC and ACIP to share guidelines for nominations to ACIP work groups given that organizational liaisons are no longer eligible to serve on work groups and ensure that vaccine policy in the United States is informed by scientific and clinical expertise, is evidence-based, and focused on our collective health and well-being.

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Thank you for taking the time to review our feedback. For additional information or if you have any questions, please do not hesitate to contact Anna Kim at akim@americangeriatrics.org.

Sincerely,

A handwritten signature in black ink that reads "Nancy E. Lundebjerg". The signature is fluid and cursive, with the first name "Nancy" and last name "Lundebjerg" clearly legible.

Nancy E. Lundebjerg, MPA
Chief Executive Officer