

February 21, 2025

The Honorable Robert F. Kennedy, Jr. Secretary U.S. Department of Health and Human Services (HHS) 200 Independence Ave SW Washington, DC 20201

## Re: Support for the Advisory Committee on Immunization Practices and Utilizing Pharmacist Expertise

Dear Secretary Kennedy:

On behalf of the American Pharmacists Association (APhA), representing our nation's over 340,000 pharmacists, 30,000 student pharmacists, and over 400,000 pharmacy technicians at every site of care, I am writing to provide input and request consideration related to the Centers for Disease Control and Prevention (CDC) Advisory Committee on Immunization Practices (ACIP).

APhA appreciates your desire to ensure that "conflicts of interest" between scientists and health care providers who are represented on these committees and the pharmaceutical industry are minimized so that independent and trustworthy decisions are made. Despite declining public trust in most professions over the past quarter century, pharmacists are ranked at the top by the public in honesty and ethics (57% high/very high). Pharmacists and those under our supervision also now administer the majority of influenza and other vaccines to adult patients in our nation, including Medicare and Medicaid beneficiaries and those who receive care from the Veteran's Administration and through our U.S. military, Indian Health Service, immigration, and prison facilities around the world. This is particularly notable because, while fears about growing avian influenza outbreaks dominate headlines in the U.S., seasonal influenza has reached its highest levels in over 15 years and has surpassed Covid-19 deaths for the past two months.

American pharmacists are the medication experts on the health care team, and their efforts have saved millions of lives and billions of dollars by keeping patients out of expensive emergency rooms. Most patients, particularly in rural and underserved areas, typically come to pharmacists first when they have a health question or concern; often, pharmacists are the only health care providers for miles. Because we are located in nearly every rural community and inner-city neighborhood, we provide unparalleled access to care in the health care system. As the medication expert, our first and primary focus is medication safety and ensuring appropriate and high-quality outcomes from patients' medicines and vaccines. Pharmacists are the last quality and safety check in the medication use process. Through this process, pharmacists ensure the safe and effective use of medications and vaccines for optimal patient well-being and chronic disease prevention and

management. Scientific inquiry and the quality of science are core to our training, and every pharmacist's training is rooted in science.

For more than 25 years, APhA has been a liaison representative to the ACIP. APhA has proudly brought our members' expertise from across the country to the table and ensured that the voice of the nation's top and most trusted provider of adult vaccines is considered. APhA respects the voting members of the ACIP and the rigorous process of selection they currently undertake. This thorough process includes demonstrating ACIP members have not received any financial incentives from vaccine manufacturers for at least one year before serving. APhA can confirm that the qualifications of the current ACIP are comprised of unbiased clinicians and scientists, and we support their retention. Additionally, APhA has served to review the annual recommended adult vaccine schedule by ACIP and issued its approval for use in alignment with seven other health care professional associations. Accordingly, APhA strongly urges HHS to maintain ACIP as the preeminent public health experts that develop recommendations on the use of vaccines in the United States.

No pharmacists are serving as voting members of ACIP despite being the largest adult vaccine providers. While APhA has supported the applications of pharmacists for such an appointment, none of our candidates have ever been selected by the Secretary. As HHS understands, while ACIP's recommendations help guide the use of vaccines to control diseases, these recommendations are only adopted as official CDC policy once approved by the CDC Director on your team, who is nominated by the President and confirmed by the U.S. Senate. We are hopeful that in the future, you will strongly consider working with the incoming CDC Director to select a pharmacist as a voting member of ACIP based on practical vaccination experience and medication expertise. APhA would be delighted to work with you to identify a well-qualified pharmacist to serve in this capacity.

Thank you for considering ensuring America's trusted medication experts remain and take on a larger role at the ACIP table. Many rural communities have no access to health care except for their local pharmacist, and APhA offers its assistance to support your efforts to improve our nation's health. APhA can help your administration lower health care costs and support local small businesses and our patients. Please contact Michael Baxter on my staff at <a href="mailto:mbaxter@aphanet.org">mbaxter@aphanet.org</a> to arrange a meeting with me to discuss these recommendations.

Sincerely,

Michael D. Hogue, PharmD, FAPhA, FNAP, FFIP

**Executive Vice President and CEO**