



Global Healthy Living Foundation  
515 North Midland Avenue  
Upper Nyack, New York 10960 USA  
+1 845 348 0400  
+1 845 340 0210 fax  
[www.ghlf.org](http://www.ghlf.org)

**Public Comment for ACIP Meeting – June 25-27, 2025  
Submitted by the Global Healthy Living Foundation (GHLF)**

*RE: Urgent Need for Clarity and Consistency in COVID-19 Vaccine Guidance for Chronically Ill and Immunocompromised Patients*

On behalf of the Global Healthy Living Foundation (GHLF) and the millions of chronically ill and immunocompromised patients we serve, we applaud the work of the Advisory Committee on Immunization Practices (ACIP) for its leadership in protecting public health. GHLF is a patient-centered nonprofit organization committed to advancing education, access, and equity in healthcare, particularly for those most vulnerable to infectious disease and vaccine-preventable illness.

Today, our community is afraid.

They fear being left unprotected this fall and winter due to unclear COVID-19 booster eligibility guidance. They fear insurance denials, unexpected out-of-pocket costs, and supply chain gaps that may prevent pharmacies from stocking the vaccine at all. They fear that without clear, consistent guidance from trusted scientific authorities, the system designed to protect them will falter.

Now, in an unprecedented and deeply concerning move, Secretary of Health and Human Services Robert F. Kennedy Jr. has removed all 17 members of this committee. GHLF strongly opposes this decision.

This mass dismissal not only disregards decades of public health precedent but risks dismantling one of the most respected, transparent, and science-driven advisory bodies in the world. Secretary Kennedy has publicly claimed that ACIP members have “serious conflicts of interest” and have acted as a “rubber stamp for industry profit-taking agendas.” These accusations are not just unsubstantiated; they are dangerously misleading.

The government report cited to justify these claims dates back to 2009<sup>1</sup> and focused on clerical errors in disclosure forms across various advisory committees—not on actual financial conflicts or misconduct. In fact, the Inspector General’s own findings and former CDC officials confirm that serious conflicts of interest among ACIP members were rare and, when found, did not rise to the level of criminal violations. Since that time, the committee’s ethics and disclosure processes have only grown more rigorous. Members undergo intensive scrutiny, recuse themselves when necessary, and

---

<sup>1</sup> <https://oig.hhs.gov/documents/evaluation/2517/OEI-04-07-00260-Complete%20Report.pdf>.

often sacrifice paid research opportunities to serve in unpaid roles solely out of commitment to public health.

Misrepresenting these processes erodes public trust and weakens the scientific foundation of vaccine policymaking. That erosion is not theoretical: it is real, immediate, and consequential for the patients we serve.

People with chronic illnesses and compromised immune systems depend on vaccines to survive. They also depend on the immunity of those around them. Public confusion—fueled by politics, not evidence—undermines this fragile ecosystem of protection. When decision-making is politicized, when experts are removed en masse, and when guidance is delayed or diluted, the impact falls hardest on those already most at risk.

**In this moment of uncertainty, we urge ACIP to reaffirm your commitment to scientific independence and to act boldly and clearly on behalf of vulnerable patients. Specifically, we ask ACIP to:**

- **Issue strong, unambiguous recommendations** for the fall COVID-19 booster, including immunocompromised individuals and their household contacts.
- **Publicly reject disinformation** about alleged conflicts of interest and reinforce the integrity of ACIP's rigorous ethics and transparency protocols.
- **Communicate clearly** when CDC guidance differs from FDA indications, and explain the rationale in language accessible to the public, providers, and policymakers.
- **Collaborate with CDC and CMS** to ensure insurers are given direct guidance that these vaccines should be fully covered and that cost is not a barrier.
- **Recognize the compounding impact** of unclear guidance on people with limited mobility, low health literacy, or barriers to accessing care.

The United States cannot afford to politicize vaccine policy. The world is watching. Our patients are waiting. ACIP must continue to serve as a bulwark against misinformation, not a casualty of it.

We stand with the committee's long-standing commitment to evidence, ethics, and public health—and we urge you to continue serving the American people with the transparency and scientific rigor that has long defined your work.

Thank you for your service and dedication.

Sincerely,  
Steven Newmark  
Chief Policy Officer  
Global Healthy Living Foundation