

November 21, 2025

Advisory Committee on Immunization Practices
Centers for Disease Control and Prevention
1600 Clifton Road NE
MS H24-8
Atlanta, GA 30329-4027

Submitted online at <https://www.regulations.gov>

Re: Docket No. CDC-2025-0783, Meeting of the Advisory Committee on Immunization Practices

To the Advisory Committee on Immunization Practices:

The 69 undersigned organizations urge the Advisory Committee on Immunization Practices to protect patient access by ensuring recommendations preserve provider and parental choice.

Protecting infants, especially when they are most vulnerable, requires timely access to care and meaningful clinical choice. Families deserve not only access to safe and effective immunizations, but also the flexibility to make informed decisions with their healthcare providers — aided by broad and inclusive recommendations. Because no single preventive option works for every family, every healthcare provider or every setting. **The Committee can protect access and choice by maintaining the hepatitis B birth-dose recommendation so that no newborn is left without the chance for early and critical protection.**

The recommendation to administer a hepatitis B vaccine at birth has been the standard of care since 1991 — a best practice that has dramatically reduced childhood transmission. This policy was designed to close a critical gap: while expectant mothers are routinely screened, two-thirds of pediatric hepatitis B infections occur in cases where the mother initially tested negative, and the virus was later transmitted through other household or community exposures. With only one in three people living with hepatitis B aware of their status, the birth dose has proven essential in protecting infants from the moment they enter the world. Infants who do acquire it have up to a 90% chance of a chronic, life-long hepatitis B infection that can lead to liver disease, liver cancer or even death. **A broad birth-dose recommendation ensures that every family has the option for immediate access.**

We urge you to continue the use of evidence-based frameworks for immunization recommendations and keep the current hepatitis B birth-dose recommendation to ensure all babies have access to protection and to preserve a parents' choice to vaccinate at birth. The current ACIP recommendation, guided by evidence-based methods including EtR and GRADE, empowers parents and healthcare providers to make these choices by ensuring insurers cover the vaccine and that there is wide-spread availability in communities. Any change to the current recommendation may restrict access and parental choice and may also cause severe disruptions to the overall childhood vaccine schedule by impacting the use of vaccines that protect against polio, diphtheria, tetanus, pertussis, and haemophilus influenzae type B (HIB).

The Committee's decisions carry weight far beyond the meeting room where recommendations are made — they guide healthcare provider practices, shape insurance coverage, and ultimately determine how families protect their children. **Narrowing or removing recommendations will not increase choice — it will reduce it, creating barriers for families and providers when timely access is most critical.** We must sustain, not jeopardize, recent gains in reducing preventable illness and hospitalization and ensure every infant can grow up healthy.

Please contact Susan Hepworth, Executive Director of the National Coalition for Infant Health with any questions or to discuss the importance of access to the hepatitis B vaccine at susan@infanthealth.org.

Sincerely,

Alliance for Aging Research
Alliance for Black NICU Families
Alliance for Patient Access
Alliance for Women's Health and Prevention
American Academy of Pediatrics
American Academy of Physician Associates
American Association of Psychiatric Pharmacists
American Families for Vaccines
American Pharmacists Association
American Society for Meningitis Prevention
Andrews County Immunization Coalition
Arizona Families for Vaccines
Arkansas Immunization Action Coalition
Big Cities Health Coalition
Council of International Neonatal Nurses
EverThrive Illinois
Families Fighting Flu
Gerontological Society of America
GLO Premies
Hand to Hold
HealthyWomen
Hennepin Healthcare
Hispanic Health Network/Latino Commission on AIDS
Idaho Immunization Coalition
Illinois Public Health Association
Immune Deficiency Foundation
Immunization Coalition of Delaware
Immunization Collaboration of Tarrant County
Immunize Kansas Coalition
Immunize San Antonio Coalition
Immunize South Dakota
Immunize Wisconsin
ImmunizeVA
Indiana Association of School Nurses
Indiana Immunization Coalition
Infectious Diseases Society of America

Institute for Public Health Innovation
Johnson County Public Health
Kimberly Coffey Foundation
Massachusetts Families for Vaccines
Montana Families for Vaccines
National Association of County and City Health Officials
National Association of Neonatal Nurses
National Association of Pediatric Nurse Practitioners
National Association of School Nurses
National Black Nurses Association, Inc
National Coalition for Infant Health
National Foundation for Infectious Diseases
New Jersey Chapter, American Academy of Pediatrics
New York State Academy of Family Physicians
NICU Parent Network
NY State American Academy of Pediatrics
Oregon Families for Vaccines
Pediatric Nurse Practitioner House Calls
Pennsylvania Immunization Coalition
PremieWorld Foundation
Routt County Public Health
Saint Louis County Department of Public Health
South Carolina Chapter of the American Academy of Pediatrics
South Dakota Families for Vaccines
Super Shot Inc.
Tennessee Families for Vaccines
Texas Department of State Health Services
The Arizona Partnership for Immunization
The J.A.M.I.E. Group
Utah Public Health Association
Vaccinate Your Family
West Virginia Families for Immunizations
Wilderness Health