

RetireSafe

Standing up for America's Seniors!

Cynthia Goss

Deputy Assistant Secretary for Planning and Evaluation (Health Policy)

U.S. Department of Health and Human Services

200 Independence Ave SW

Washington, DC 20201

Dear Deputy Assistant Secretary Goss,

On behalf of my senior advocacy organization, RetireSafe, thank you for the opportunity to provide feedback on childhood vaccine recommendations. RetireSafe is a nonprofit organization that advocates on behalf of America's seniors, many of whom are grandparents actively engaged in their grandchildren's health decisions. Although our organization focuses on America's seniors, we also know that grandparents are often among the most trusted voices a family has on questions of vaccination, particularly in communities where access to care and confidence in medical institutions have historically been uneven.

That trust is not automatic; it depends on families believing that the recommendations they are being asked to rely on were arrived at honestly and that the protections built around vaccination have not quietly eroded. RetireSafe's comments focus on conditions we believe are necessary to preserve that trust as the Department considers this framework: an open, evidence-based process for any changes to these categories, and continued, unambiguous access to compensation under the National Vaccine Injury Compensation Program (VICP), regardless of how a vaccine is categorized.

RetireSafe urges the Department to ensure that any revisions to the routine, risk-based, and shared clinical decision-making categories are developed transparently, grounded in the best available science, and subject to meaningful public review before they are finalized. The Advisory Committee on Immunization Practices (ACIP) exists because vaccine recommendations require sustained technical review by experts who can weigh the evidence in ways no single official can on their own. That expert review should continue to be the basis for how these categories are defined and applied. Additionally, these decisions should not be made behind closed doors or presented to the public as a foregone conclusion. They should reflect the full weight of the evidence and allow for meaningful public input before they are finalized.

RetireSafe also urges the Department to ensure that no revision to the category framework narrows a patient's or family's access to compensation under the VICP. The National Childhood Vaccine Injury Act of 1986, the statute that established the task force

conducting this review, also created the VICP, our nation's no-fault system for compensating those rarely injured by a covered vaccine. That system was built in response to litigation in the 1980s that threatened to drive vaccine manufacturers out of the market altogether. It should not be put at risk as a side effect of relabeling how a vaccine is recommended.

If category changes could plausibly affect a vaccine's status under the Vaccine Injury Table or VICP eligibility, the Department should say so clearly in advance and address it rather than leave families and providers to discover the answer through a claim. Uncertainty on this point does not only affect individual families; it undermines confidence in the broader system that has kept vaccines available and litigation-related supply disruptions at bay for nearly forty years. Unclear compensation or liability protections also make it harder for manufacturers to justify continued investment in developing and improving vaccines, which depends on a predictable legal and regulatory environment.

RetireSafe appreciates the opportunity to comment and shares the Department's stated interest in a framework that “builds durable trust.” We believe that trust will be won or lost less by which category labels the Department ultimately adopts than by whether the process that produces them is visibly open, and whether the protections families have relied on for decades remain intact. We urge the Department to commit to both as it moves forward.

Respectfully,

Mark Gibbons

President, RetireSafe