



The National Voice for Direct-Care RNs

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June 20, 2025

Members of the Advisory Committee on Immunization Practices (ACIP)
U.S. Department of Health and Human Services
Centers for Disease Control and Prevention
1600 Clifton Rd
Atlanta, GA 30329

Re: Docket No. CDC-2025-0024, Meeting of the Advisory Committee on Immunization Practices

Dear ACIP Members:

On behalf of more than 225,000 registered nurse (RNs) members, National Nurses United (NNU), the largest labor union and professional association for RNs in the United States, submits these comments in response to the request for comments regarding the public meeting of the Advisory Committee on Immunization Practices (ACIP) from June 25 to June 26, 2025.

As the nation's frontline health care workforce, RNs are acutely aware of the importance that vaccines play in safeguarding the health of our patients and communities. Vaccines are an important part of a multilayered approach to infection prevention and public health—indeed, childhood vaccination has been estimated to save 154 million lives globally over the past 50 years¹ and the Covid-19 vaccines are estimated to have saved 19.8 million lives in the first year of the pandemic alone.² ACIP has a long history of providing expert review of vaccine data and key recommendations to support the Centers for Disease Control and Prevention (CDC) and to protect public health. NNU urges all new ACIP members to uphold the committee's legacy and commitment to science and to ensure continued access to vaccines, including ensuring that Covid-19 vaccines—which have been proven to be safe and effective³—remain available and accessible to RNs, other health care workers, and patients of all ages.

I. Vaccines are a critical public health protection and have saved lives.

Multiple vaccines have been introduced over the past century to respond to infectious diseases causing significant morbidity and sometimes mortality, especially amongst children, including diphtheria, measles, hepatitis B, pertussis, polio, and Covid-19. With each vaccine, after scientists develop the vaccine, it undergoes extensive testing and that data is thoroughly reviewed by experts in the FDA and CDC, who determine when and if it

¹ Shattock, A.J., Johnson, H.C., et al., "Contribution of vaccination to improved survival and health: modelling 50 years of the Expanded Programme on Immunization," *The Lancet*, 2024, 403(10441): 2307-16.

² Mellis, C., "Lives saved by COVID-19 vaccines," *J Paediatr Child Health*, Sept 20, 2022.

³ CDC, "COVID Data Tracker," May 10, 2024 <https://covid.cdc.gov/covid-data-tracker/#vaccine-effectiveness> (Accessed May 23, 2025).

is safe and effective enough to approve and recommend for use. These vaccines have led to a significant decrease in the burden of disease and have improved health and life expectancy dramatically in the United States.⁴

Scientific data clearly indicate that vaccines are safe and effective public health protections. Vaccines have prevented at least 103 million cases of childhood diseases and their accompanying death, disability, and illness since 1924 in the United States,⁵ with very rare serious adverse events at rates significantly lower than with infection.⁶ Outbreaks and resurgences of vaccine-preventable diseases are linked to low immunization rates.⁷ RNs see firsthand the impacts that infectious diseases have on patients and their families—including the ways that vaccines protect patients' health and how missing vaccinations can leave patients vulnerable to debilitating and deadly diseases.

Research has also documented additional impacts of vaccines and improved health. For children born between 1994 and 2013 in the United States, routine childhood vaccinations, as administered under the Vaccines for Children program, are estimated to prevent 21 million hospitalizations and 732,000 premature deaths over the course of their lives, averting an estimated \$402 billion in direct health care costs and \$1.5 trillion in societal costs.⁸ Prevention of infections and serious illnesses during early childhood years is likely to have long-term positive benefits for health and development.⁹

II. Covid-19 vaccines have saved millions of lives and are a critical part of protecting public health across all age groups.

Specifically, Covid-19 vaccines have been shown to protect against severe disease, hospitalization, and death. One study found that the 2024 – 2025 Covid-19 vaccine was 33 percent effective in preventing Covid-related emergency department or urgent care visits among adults aged ≥18 years and about 46 percent protective against hospitalizations

⁴ Talbird, S.E., J. Carrico, et al., "Impact of Routine Childhood Immunization in Reducing Vaccine-Preventable Diseases in the United States," *Pediatrics*, 2022, 150(3): e2021056013.

⁵ Van Panhuis, W.G., Grefenstette, J., et al., "Contagious Diseases in the United States from 1888 to the Present," *NEJM*, 2018, 369(22).

⁶ Gidengil, C., Goetz, M.B., et al., "Safety of vaccines used for routine immunization in the United States: An updated systematic review and meta-analysis," *Vaccine*, 2021, 39(28): 3696-3716.

⁷ Van Panhuis, W.G., Grefenstette, J., et al., "Contagious Diseases in the United States from 1888 to the Present," *NEJM*, 2018, 369(22).

⁸ Whitney, C.G., Zhou, F. et al. "Benefits from Immunization During the Vaccines for Children Program Era — United States, 1994–2013," *MMWR*, 2014, 63(16): 352-55.

⁹ Nandi, A. and Shet, A., "Why vaccines matter: understanding the broader health, economic, and child development benefits of routine vaccination," *Hum Vaccin Immunother*, 2020, 16(8): 1900-4.

among immunocompetent older adults.¹⁰ Another study found that Covid-19 vaccine boosters were associated with a 75.1 percent reduction in severe disease.¹¹

However, new policies from the Department of Health and Human Services (HHS) erroneously assume that Covid-19 only impacts elderly and high-risk populations. For example, the Food and Drug Administration's (FDA) recent approvals of new Covid-19 vaccines restrict access to Covid-19 boosters to only those over 65 years or at high risk for severe Covid-19.^{12, 13} Similarly, HHS Secretary, Robert F. Kennedy, Jr., recently announced that the CDC would no longer recommend Covid-19 vaccines for healthy children and pregnant people.¹⁴

To the contrary, Covid-19 continues to cause hospitalizations, morbidity, and mortality across all age groups, even in individuals without underlying conditions, in the United States, as was recognized during the April 15 to April 16, 2025 ACIP meeting.¹⁵ Preliminary estimates from the U.S. Centers for Disease Control and Prevention found that between 260,000 and 430,000 Covid-19-associated hospitalizations and nearly 47,000 Covid-19-deaths occurred since 2024, across all age groups including pediatric populations.^{16,17} Waning immunity from vaccines and the emergence of new variants renders people vulnerable to severe disease, long-term health complications, and death. The risk of long Covid—a condition that impacts approximately 7 percent of adults with Covid-19¹⁸—increases with each subsequent infection¹⁹ and is a risk that cannot be ignored.

¹⁰ Link-Gelles, R., Chickery, S., et al., "Interim Estimates of 2024–2025 COVID-19 Vaccine Effectiveness Among Adults Aged ≥18 Years — VISION and IVY Networks, September 2024–January 2025," *MMWR*, Feb. 27, 2025;74:73–82.

¹¹ Chemaitelly, H., Ayoub, H. H., et al., "Long-term COVID-19 booster effectiveness by infection history and clinical vulnerability and immune imprinting: a retrospective population-based cohort study," *The Lancet Infectious Diseases*, July 2023, 23(7), 816–827.

¹² Moderna, "Moderna Receives U.S. FDA Approval for COVID-19 Vaccine mNEXSPIKE," May 31, 2025, <https://investors.modernatx.com/news/news-details/2025/Moderna-Receives-U-S-FDA-Approval-for-COVID-19-Vaccine-mNEXSPIKE/> (Accessed June 16, 2025).

¹³ Novavax, "U.S. FDA Approves BLA for Novavax's COVID-19 Vaccine," May 19, 2025, <https://ir.novavax.com/press-releases/2025-05-19-U-S-FDA-Approves-BLA-for-Novavaxs-COVID-19-Vaccine> (Accessed June 16, 2025).

¹⁴ Mandavilli, A. & Jewett, C. "U.S. Will No Longer Recommend Covid Shots for Children and Pregnant Women." *New York Times*, May 27, 2025, <https://www.nytimes.com/2025/05/27/health/covid-vaccines-children-pregnant-women-rfk-jr.html>.

¹⁵ Havers, F. "Epidemiology and risk factors for COVID-19 hospitalizations." CDC, April 15, 2025, <https://www.cdc.gov/acip/downloads/slides-2025-04-15-16/03-Havers-COVID-508.pdf>.

¹⁶ CDC, "Preliminary Estimates of COVID-19 Burden for 2024–2025," December 6, 2024, <https://www.cdc.gov/covid/php/surveillance/burden-estimates.html> (Accessed May 22, 2025).

¹⁷ CDC, "COVID Data Tracker," May 22, 2025, <https://covid.cdc.gov/covid-data-tracker> (Accessed May 22, 2025).

¹⁸ KFF, "Long COVID Rates Appear to be Stabilizing, Affecting About 1 in 10 Adults Who Have Had COVID," April 9, 2024, <https://www.kff.org/coronavirus-covid-19/press-release/long-covid-rates-appear-to-be-stabilizing-affecting-about-1-in-10-adults-who-have-had-covid/> (Accessed May 23, 2025).

¹⁹ Peluso, MJ., Deeks, SG., "Mechanisms of long COVID and the path toward therapeutics," *Cell*, October 3, 2024; 187(20):5500–29.

III. Optimal infection control protections, including access to Covid-19 vaccines, are necessary to protect the health and safety of RNs, other health care workers, and patients.

Covid-19 poses a significant occupational risk to RNs and other health care workers, who continue to be on the frontlines of the Covid-19 response. Studies have consistently documented higher rates of Covid-19 infections and disease among health care workers than the general population.^{20,21}

Optimal protection of health care workers through robust infection control measures, including optimal PPE, ventilation, and access to Covid-19 vaccines and boosters, is necessary in order for health care workers to safely provide care for patients.^{22,23} Indeed, Covid-19 vaccination and boosters have been shown to prevent hospitalization and infection with symptomatic Covid-19²⁴ and to reduce time off work caused by infection among health care workers.²⁵

Yet, new Covid-19 vaccine policies from HHS agencies appear to ignore the increased occupational exposure risk that RNs and other health care workers continue to face. This omission would have a severe and negative impact on the safety of our RNs and health care workers, and we urge ACIP to ensure that RNs and other health care workers have continued access to Covid-19 vaccines and boosters.

IV. Long Covid remains a serious public health crisis for which there is no treatment or cure.

Public health measures regarding Covid-19 must take into account the significant risk of long Covid. Long Covid is a serious condition that can impact all major organ systems, causing debilitating symptoms that can last from a few weeks to several years following a

²⁰ Nguyen, L.H., D.A. Drew, et al., "Risk of COVID-19 among front-line health-care workers and the general community: a prospective cohort study," *The Lancet Public Health*, July 31, 2020, 5(9): e475-83.

²¹ Barrett, E.S., Horton, D.B., Roy, J. et al., "Prevalence of SARS-CoV-2 infection in previously undiagnosed health care workers in New Jersey, at the onset of the U.S. COVID-19 pandemic," *BMC Infectious Diseases*, November 16, 2020, 20(1):853.

²² Daniel W, Nivet M, et al., "Early evidence of the effect of SARS-CoV-2 vaccine at one medical center," *New England Journal of Medicine*, March 23, 2021, 384:1962–1963.

²³ Keehner, J., Horton, L.E. et al., "SARS-CoV-2 Infection after Vaccination in Health Care Workers in California," *New England Journal of Medicine*, March 23, 2021, 384, 1774–1775.

²⁴ Galgut, O., Ashford, F., et al., "COVID-19 vaccines are effective at preventing symptomatic and severe infection among healthcare workers: A clinical review," *Vaccine X*, August 2024, 20:100546.

²⁵ Maltezou, H.C., Gamaletsou, M.N., et al., "Effectiveness of COVID-19 booster vaccination, morbidity and absenteeism among healthcare personnel during the 2022–2023 season dominated by Omicron BA.5 and BA.2 subvariants," *Vaccine*, 2024, 42(17): 3693-8

Covid-19 infection, including mild initial infections.²⁶ Long Covid has been estimated to impact 7 percent of the population, or over 23 million people, in the United States.²⁷ The risk of long Covid increases with each subsequent infection.²⁸

Covid-19 vaccines and boosters have been shown to decrease the risk of long Covid.^{29,30} However, HHS' new Covid-19 vaccine policies ignore the risk of long Covid entirely. This is a dangerous and problematic omission, especially for RNs and other health care workers who are at particularly high risk of developing long Covid.³¹ NNU's 2024 infectious diseases survey documented significant impacts of long Covid experienced by RNs, including fatigue, memory or concentration difficulties, muscle pain, headaches or migraines, shortness of breath, and other symptoms.³² For 50 percent of RN survey respondents, long Covid symptoms lasted longer than six months and a majority of RNs with long Covid reported that their symptoms have affected their ability to work (73.5 percent) and their daily activities outside of work (86.9 percent).³³

Maintaining access to Covid-19 vaccines for RNs and other frontline health care workers at high risk of exposure to and infection with Covid-19 in the workplace is essential to protecting their health at work.

In Conclusion

Vaccines, including Covid-19 vaccines, play an essential role in protecting public health and workplace health and safety for RNs and other health care workers. Limiting access to and availability of lifesaving Covid-19 and other vaccines unnecessarily puts lives at risk. With health equity being central to the practice of nursing, nurses will continue to advocate for strong public health measures to protect and foster patients' health and healing, at the bedside and beyond.

²⁶ CDC, "Long COVID Basics," February 3 2025, <https://www.cdc.gov/covid/long-term-effects/index.html> (Accessed May 23, 2025).

²⁷ KFF, "Long COVID Rates Appear to be Stabilizing, Affecting About 1 in 10 Adults Who Have Had COVID," April 9, 2024, <https://www.kff.org/coronavirus-covid-19/press-release/long-covid-rates-appear-to-be-stabilizing-affecting-about-1-in-10-adults-who-have-had-covid/> (Accessed May 23, 2025).

²⁸ Peluso, MJ., Deeks, SG., "Mechanisms of long COVID and the path toward therapeutics," *Cell*, October 3, 2024; 187(20):5500-29.

²⁹ Xie, Y., Choi, T., et al., "Postacute Sequelae of SARS-CoV-2 Infection in the Pre-Delta, Delta, and Omicron Eras," *NEJM*, 2024, 391: 515-25.

³⁰ Hedberg, P., van der Werff, S.D., et al., "The Effect of COVID-19 Vaccination on the Risk of Persistent Post-COVID-19 Condition: Cohort Study," *The Journal of Infectious Diseases*, March 12, 2025.

³¹ Al-Oraibi, A., Woolf, K., et al., "Global prevalence of long COVID and its most common symptoms among healthcare workers: a systematic review and meta-analysis," *BMJ Public Health*, April 16, 2025.

³² National Nurses United, "NNU Infectious Diseases Survey: November 2024 Preliminary Results," November 13, 2024, <https://www.nationalnursesunited.org/infectious-diseases-survey-november-2024-preliminary-results> (Accessed May 22, 2025).

³³ Ibid.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Hagans". The script is fluid and cursive, with the first name "Nancy" and last name "Hagans" clearly distinguishable.

Nancy Hagans, RN
President, National Nurses United