



*The National Voice for Direct-Care RNs*

WASHINGTON DC  
8455 Colesville Road  
Suite 1100  
Silver Spring MD 20910  
phone: 800-287-5021  
fax: 240-235-2019

OAKLAND  
155 Grand Avenue  
Suite 100  
Oakland CA 94612  
phone: 800-504-7859  
fax: 510-663-1625

November 24, 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-2025-0783, 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 December 4 to December 5, 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 have saved 154 million lives globally over the past 50 years.<sup>1</sup> In particular, vaccination against hepatitis B virus (HBV) is estimated to save 38 million lives in low- and middle-income countries from 2000 to 2030.<sup>2</sup> ACIP has a long history of providing expert review of vaccine data and making key recommendations to support the Centers for Disease Control and Prevention (CDC) and protect public health. NNU urges all ACIP members to uphold the committee's legacy and commitment to science and ensure vaccines, including HBV vaccination, remain available and accessible to RNs, other health care workers, and patients of all ages.

**I. Vaccines, including HBV vaccines, have saved millions of lives and are a critical part of protecting public health, especially in young children.**

Scientific data clearly indicate that vaccines are safe and effective public health protections. Vaccines have prevented at least 103 million cases of seven childhood diseases and their

---

<sup>1</sup> 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.

<sup>2</sup> Li X., Mukandavire C., et al. Estimating the health impact of vaccination against ten pathogens in 98 low-income and middle-income countries from 2000 to 2030: a modelling study. *The Lancet*, 2021, 397(10272): 398-408.

accompanying death, disability, or illness since 1924 in the United States,<sup>3</sup> with very rare serious adverse events at rates significantly lower than with infection.<sup>4</sup> Routine childhood immunization in the United States continues to result in sustained reductions in incidence of vaccine-preventable diseases, with 24 million cases of 14 different illnesses, including influenza, rotavirus, and pneumonia, being averted in 2019 alone due to routine immunization.<sup>5</sup> Unsurprisingly, outbreaks and resurgences of vaccine-preventable diseases are linked to low immunization rates.<sup>6</sup> 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.

The HBV vaccine specifically has been shown to protect against severe disease and death, especially in children. In 2022, 254 million people were living with chronic HBV globally, with 1.2 million new infections and 1.1 million deaths each year.<sup>7</sup> The risk of chronic HBV is greater in infants and children than other age groups—while approximately 95 percent of adults with acute HBV will completely recover, 90 percent of infected infants and 30 percent of infected children aged one to five will become chronically infected.<sup>8</sup> Chronic infection carries significant, lifelong risk of morbidity and mortality. Before the CDC began recommending HBV vaccination for all infants in 1991, with the first dose being administered at birth before hospital discharge, 16,000 children younger than 10 years of age became infected with HBV annually in the United States.<sup>9,10</sup> From 1990 to 2019, incidence of acute HBV among children and adolescents younger than 19 years of age decreased by 99 percent in the United States due to universal infant vaccination. Routine HBV immunization is an essential public health strategy that has prevented lifelong infections in thousands of American children.

Research has also documented additional impacts of vaccines and improved health outcomes resulting from the Vaccines for Children (VFC) program, which covers the cost of vaccines for children whose families might not otherwise be able to afford vaccines. For children born between 1994 and 2023 in the United States, routine childhood vaccinations, as administered

---

<sup>3</sup> Van Panhuis, W.G., Grefenstette, J., et al., "Contagious Diseases in the United States from 1888 to the Present," *NEJM*, 2018, 369(22).

<sup>4</sup> 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.

<sup>5</sup> 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.

<sup>6</sup> Van Panhuis, W.G., Grefenstette, J., et al., "Contagious Diseases in the United States from 1888 to the Present," *NEJM*, 2018, 369(22).

<sup>7</sup> WHO, "Hepatitis B," July 23, 2025, <https://www.who.int/news-room/fact-sheets/detail/hepatitis-b> (Accessed November 18, 2025).

<sup>8</sup> CDC, "Clinical Overview of Hepatitis B," August 29, 2025, <https://www.cdc.gov/hepatitis-b/hcp/clinical-overview/index.html> (Accessed November 18, 2025).

<sup>9</sup> Allred, N.J. "Newborn Hepatitis B Vaccination Coverage Among Children Born January 2003--June 2005 --- United States" *CDC MMWR*, August 1, 2008, <https://www.cdc.gov/mmwr/preview/mmwrhtml/mm5730a3.htm> (Accessed November 18, 2025).

<sup>10</sup> Armstrong, G.L., Mast E.E., et al., "Childhood Hepatitis B Virus Infections in the United States Before Hepatitis B Immunization," *Pediatrics*, 2001, 108 (5): 1123–1128.

under the VFC program, are estimated to prevent 508 million lifetime cases of illness, 32 million hospitalizations, and 1,129,000 premature deaths, averting an estimated net savings of \$540 billion in direct health care costs and \$2.7 trillion in societal costs.<sup>11</sup> Prevention of infections and serious illnesses during early childhood years is expected to have long-term positive benefits on health and development.<sup>12</sup> Ensuring that childhood vaccines remain available and accessible to all children—regardless of their family's socioeconomic status—is critical.

## **II. Optimal infection control protections, including access to HBV vaccines, are necessary to protect the health and safety of RNs, other health care workers, and patients.**

RNs and other health care workers are at an increased risk of HBV exposure and infection. Health care workers involved in direct patient care often are exposed to blood and other bodily fluids through accidental needlestick or sharp object injuries, contact with infected fluid through broken skin or mucous membranes, or splashes. Sharp object injuries account for 75 percent of occupational exposures in health care settings, with the remaining 25 percent of exposures occurring via the eyes, mouth, or skin.<sup>13</sup> Each year, approximately three million health care workers receive a sharp object injury, resulting in 2,000,000 exposures to HBV globally.<sup>14,15</sup>

Optimal protection of health care workers through robust infection control measures, including standard precautions, proper use and disposal of sharps, and access to HBV vaccines, is necessary in order for health care workers to safely provide care for patients. In the United States, the incidence of HBV among health care personnel decreased from 10,000 cases in 1982 to 304 cases in 2004, in large part due to growing vaccination coverage and the decreased prevalence of HBV.<sup>16</sup> However, other countries with higher prevalences of HBV experience much greater rates of occupational infection in health care workers. For example, the prevalence of infection among health care personnel was found to greatly vary across the world, ranging from 0.6 percent in Europe to almost nine percent in Africa.<sup>17</sup>

Yet, new vaccine policies from the Department of Human and Health Services (HHS) agencies appear to ignore the risk that comes with increasing prevalence of infectious diseases and, consequently, an increased occupational exposure risk that RNs and other health care workers

---

<sup>11</sup> Zhou, F., Jatlaoui, T.C., et al. "Health and Economic Benefits of Routine Childhood Immunizations in the Era of the Vaccines for Children Program - United States, 1994-2023," *MMWR*, 2024, 73(31):682-685.

<sup>12</sup> 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.

<sup>13</sup> Coppola, N., De Pascalis, S., et al. "Hepatitis B virus and hepatitis C virus infection in healthcare workers." *World Journal of Hepatology*, February 8, 2016, 8(5):273-281.

<sup>14</sup> *Ibid.*

<sup>15</sup> Elseviers, M.M., Arias-Guillén, M., et al. "Sharps injuries amongst healthcare workers: review of incidence, transmissions and costs," *Journal of Renal Care*, 2014, 40(3): 150-6.

<sup>16</sup> Byrd, K.K., Lu, P., et al. "Hepatitis B Vaccination Coverage Among Health-Care Personnel in the United States." 2013, *Public Health Reports*, 128(6):498-509.

<sup>17</sup> Nikolopoulou, G.B., Tzoutzas, I., et al. "Hepatitis B in Healthcare Personnel: An Update on the Global Landscape," *Viruses*, 2023, 15(12):2454.

continue to face. Any policies that restrict access to vaccines that have been shown to be safe and effective endanger our lives and our patients' lives.

### **III. Attacks on safe and effective vaccines are an attack on our patients' right to health.**

The Trump administration is systematically undermining the scientific integrity of our nation's public health agencies. HHS Secretary Robert F. Kennedy, Jr. has repeatedly undermined and attacked science, vaccines, and public health. Secretary Kennedy severely impaired vaccine science by cancelling \$500 million in contracts that funded mRNA vaccine research and development.<sup>18</sup> Kennedy has also actively attacked vaccines, including firing all 17 former ACIP members and replacing them with vaccine skeptics and anti-vaccine activists.<sup>19</sup> Kennedy fired CDC Director Susan Monarez after she rejected demands to approve vaccine recommendations without scientific evidence.<sup>20</sup> Moreover, President Trump's Executive Orders have cut scientific funding and grants and allowed for increased political interference in scientific processes.<sup>21</sup> By actively undermining trust in vaccines, one of the most effective public health developments in modern history, the Trump administration is working to dismantle our public health infrastructure and shift responsibility for health from the collective to the individual.

The Trump administration's attacks on vaccines are part of a larger assault on our public health care agencies. The passage of Trump's budget reconciliation bill, which represents one of the largest transfers of wealth in U.S. history, steals more than \$1.1 trillion in Medicaid and Affordable Care Act (ACA) funding from everyday Americans and slashes insurance for over 10 million people to fund tax cuts for billionaires and corporations.<sup>22</sup> Additionally, it will cut Supplemental Nutrition Assistance Program (SNAP) food benefits for 22.3 million families.<sup>23</sup> These attacks on our public health care agencies will lead to preventable illness and deaths. Cuts to Medicaid alone have been predicted to cause an additional 51,000 preventable deaths each

---

<sup>18</sup> HHS, "HHS Winds Down mRNA Vaccine Development Under BARDA," August 5, 2025, <https://www.hhs.gov/press-room/hhs-winds-down-mrna-development-under-barda.html> (Accessed November 18, 2025).

<sup>19</sup> Schnirring, L., Van Beusekom, K. "RFK announces new ACIP members, including vaccine critics," CIDRAP, June 12, 2024, <https://www.cidrap.umn.edu/anti-science/rfk-announces-new-acip-members-including-vaccine-critics> (Accessed November 18, 2025).

<sup>20</sup> Dall, C. "Fired CDC director describes pressure from Kennedy over vaccines," CIDRAP, September 17, 2025, <https://www.cidrap.umn.edu/public-health/fired-cdc-director-describes-pressure-kennedy-over-vaccines> (Accessed November 18, 2025).

<sup>21</sup> Garisto, D. "Trump Order Gives Political Appointees Vast Powers over Research Grants," Scientific American, August 12, 2025, <https://www.scientificamerican.com/article/trump-order-would-give-political-appointees-power-over-science-funding/> (Accessed November 18, 2025).

<sup>22</sup> Center on Budget and Policy Priorities, "By the Numbers: Harmful Republican Megabill Will Take Health Coverage Away From Millions of People and Raise Families' Costs" August 27, 2025, <https://www.cbpp.org/research/health/by-the-numbers-harmful-republican-megabill-will-take-health-coverage-away-from> (Accessed November 18, 2025).

<sup>23</sup> Wheaton, L., Giannarelli, L., et al. "How the Senate Budget Reconciliation SNAP Proposals Will Affect Families in Every US State," Urban Institute, July 2, 2025, <https://www.urban.org/research/publication/how-senate-budget-reconciliation-snap-proposals-will-affect-families-every-us> (Accessed November 18, 2025).

year.<sup>24</sup> This comes at the same time that the Trump administration has restricted access to vaccines, which have saved over a million lives in the United States since 1994.<sup>25</sup> As RNs, we advocate for our patients and adamantly oppose any political agenda that threatens access to essential health services, undermines vaccinations efforts, and compromises the health and well-being of our patients.

The Trump administration's policies that erode trust in science and attack critical public health institutions are fascist strategies that are fundamentally anti-democratic. Science is an inherently democratic process—it is built upon open inquiry and evaluation of the world around us. It encourages us to ask questions and seek answers through critical thinking and problem-solving. Fascism, which is founded on absolute control, must dismantle free scientific inquiry to reign and often spreads pseudo-scientific claims that benefit their corporate-friendly, anti-regulatory agenda. The Trump administration's attacks on our public health care programs are steps in the process to privatize our public goods and enable corporations and billionaires to profit from and control our public assets.

Nurses are trained to ask questions about why patients are sick and, because we provide direct patient care, we witness firsthand the harmful impacts that fascist policies inflict on our communities. As union nurses, we will never stop advocating for our patients and the care they deserve.

#### **IV. Conclusion**

Vaccines play an essential role in protecting public health and have prevented millions of cases of illness that result in severe disease or death. As nurses, we provide hands-on care to patients across the country. We understand the dangers of anti-scientific, deregulatory policies and see the destructive impacts these policies have on our patients on a daily basis. Limiting access to and availability of lifesaving vaccines unnecessarily endangers our patients' lives. NNU will continue advocating for science-based protections as we speak up for our patients. We urge ACIP to maintain access to safe and effective vaccines and follow the best scientific evidence when making vaccine recommendations.

Sincerely,



Mary Turner  
President, National Nurses United

---

<sup>24</sup> Werner, R.M., Coe, N.B., et al. "Projected Mortality Impacts of the Budget Reconciliation Bill," Penn LDI, June 3, 2025, <https://ldi.upenn.edu/our-work/research-updates/research-memo-projected-mortality-impacts-of-the-budget-reconciliation-bill/> (Accessed November 18, 2025).

<sup>25</sup> Zhou, F., Jatlaoui, T.C., et al. "Health and Economic Benefits of Routine Childhood Immunizations in the Era of the Vaccines for Children Program - United States, 1994-2023," MMWR, 2024, 73(31):682-685.