

November 8<sup>th</sup>, 2023

The Honorable Xavier Becerra  
Secretary, Department of Health and Human  
Services (HHS)  
Immediate Office of the Secretary  
200 Independence Avenue SW  
Washington, DC 20201

Mandy Cohen, M.D., M.P.H.  
Director, Centers for Disease Control  
and Prevention (CDC)  
Office of the Director  
4770 Buford Highway, NE  
Atlanta, GA 30341

RE: Pharmacist Representation on Advisory Committee on Immunization Practices (ACIP)

Dear Secretary Becerra and Director Cohen,

We, the undersigned organizations represent 334,000 pharmacists,<sup>1</sup> practicing in the United States. In this letter, we are supported by other health care-focused organizations. Together, our organizations write to thank the Secretary for launching American Pharmacists Month with more than 100 pharmacists and pharmacy students on October 2<sup>nd</sup> and to request the appointment of a pharmacist to one of the four additional allowed medical professional seats on the CDC's Advisory Committee on Immunizations Practices (ACIP).

This recommendation is grounded in the extensive clinical knowledge and immunization service delivery expertise that pharmacists have accumulated over the past three decades. Pharmacists have been at the forefront of immunization services across the lifespan. Their crucial role in administering vaccines and providing immunization education has significantly contributed to increasing immunization rates and improving public health outcomes. Pharmacists are trained healthcare professionals who have a deep understanding of the complexities surrounding vaccines, and the significance of evidence-based recommendations issued by ACIP. They possess the clinical and practice expertise necessary to engage in discussions around the ACIP table to address concerns and provide recommendations that help individuals and healthcare professionals make informed decisions regarding their vaccinations.

While pharmacists have, and are, serving on ACIP Work Groups, and have a liaison seat through the American Pharmacists Association to ACIP, we believe granting pharmacists a voting role on the ACIP will ensure that the perspectives of the healthcare professional, and their expertise, are included within the body ultimately voting on ACIP recommendations. The profession has well-qualified clinicians and clinical scientists capable of fulfilling the role of voting member and bringing our unique perspective to the policymaking process of ACIP. It is time for ACIP to have a pharmacist among the voting members. We urge CDC to specifically recognize PharmDs

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<sup>1</sup> U.S. Bureau of Labor Statistics. Pharmacists : Occupational Outlook Handbook: : U.S. Bureau of Labor Statistics. Bls.gov. Published April 13, 2018. <https://www.bls.gov/ooh/healthcare/pharmacists.htm>

as qualified for fulfilling the scientific seats on the ACIP in its call for candidates and to make every effort to recruit and appoint a pharmacist as a voting member in the next appointment cycle. The clinical and practice implementation expertise of ACIP's voting members is critical to the important decisions made by ACIP.

Pharmacists have played a unique and accessible role within the U.S. healthcare system, particularly in vaccine distribution. As the most accessible healthcare professionals in the U.S., pharmacists administer vaccines, educate patients, address healthcare concerns, test for infectious diseases, and more beyond the traditional roles of dispensing medications.<sup>2</sup> Pharmacists are trusted healthcare professionals and alongside nurses and physicians, comprise three of the five most revered professions.<sup>3</sup> Trust in pharmacists is particularly important in minority and disadvantaged communities where pharmacist immunization services enhance equitable access to vaccines. Given the pivotal role pharmacists play in increasing education and access, particularly among the diverse range of communities who they serve, we believe a voting role on ACIP is critical to preserving and expanding access in the long-term.

Within immunizations, pharmacists' expertise is not confined to administering vaccines to adults; they also offer a broad range of immunization services for all age groups, including pediatric and adolescent populations. Their vast experience in immunization service delivery across the lifespan aligns with ACIP's mission to provide recommendations for vaccination practice and policy in the United States. Including a pharmacist as a voting member of the ACIP would ensure these recommendations are well-informed and comprehensive. Incorporating pharmacists into the decision-making process of the ACIP will strengthen the committee's ability to make evidence-based recommendations that prioritize public health. In addition to their clinical expertise, pharmacists can help address emerging immunization challenges, such as vaccine hesitancy and equitable distribution, and strategies for improving access to vaccines for underserved populations. We believe that pharmacist representation on the ACIP is necessary to understand the operational realities of vaccine program implementation, access, coverage, and hesitancy.

Despite the critical role of pharmacists in immunization programs, none of the current fourteen medical professions serving on ACIP are pharmacists, nor are the ex officio members. The inclusion of a pharmacist(s) on ACIP will support the principles of the "Immunization Neighborhood," supported by CDC and immunization stakeholders, and will strengthen the collaborative efforts between healthcare professions, promote vaccine equity, and ensure the unique needs of diverse communities are met and effectively implemented.

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<sup>2</sup> Berenbrok LA, Tang S, Gabriel N, et. al. Access to Community Pharmacies: Nationwide Geographic Information Systems Cross-Sectional Analysis. *JAPhA*. 2022; 62(6): 1816-1822. doi: 10.1016/j.japh.2022.07.003

<sup>3</sup> Saad L. Military Brass, Judges Among Professions at New Image Lows. Gallup. Jan 12<sup>th</sup>, 2022. Accessed October 5<sup>th</sup>, 2023. <https://news.gallup.com/poll/388649/military-brass-judges-among-professions-new-image-lows.aspx>

We urge you and the Steering Committee to take the necessary steps to identify a qualified pharmacist or pharmacists, in advance of the Steering Committee's Fourth Quarter meeting on nominations, for selection and appointment by the Secretary.

Sincerely,



**Signatories:**

American Society of Consultant Pharmacists (ASCP)  
Alliance for Aging Research (AAR)  
American Association of Psychiatric Pharmacists (AAPP)  
American College of Clinical Pharmacy (ACIP)  
American Pharmacists Association (APhA)

American Society of Hospital Pharmacists (ASHP)  
Healthy Men, Inc.  
Hematology/Oncology Pharmacy Association (HOPA)  
National Association of Boards of Pharmacy (NABP)  
National Association of State Pharmacy Associations (NASPA)  
National Community Pharmacists Association (NCPA)  
National Hispanic Pharmacists Association (NHPA)  
National Pharmaceutical Association (NPA)  
RetireSafe  
Senior Care Pharmacy Coalition (SCPC)  
Society of Infectious Diseases Pharmacists (SIDP)

CC:

Andrea Palm,  
Deputy Secretary, HHS  
Admiral Rachel Levine, M.D.  
Assistant Secretary of Health, HHS  
Melinda Wharton, M.D., M.P.H.  
Associated Director for Vaccine Policy, NCIRD & ACIP Executive Secretary  
Marvin Figueroa  
Director of the Office of Intergovernmental and External Affairs, HHS