

December 19, 2025

Pita Gomez
Principal Staff Liaison
Division of Injury Compensation Programs
Health Resources and Services Administration
5600 Fishers Lane
14W-18, Rockville, Maryland 20857

RE: December 2025 Meeting of the Advisory Commission on Childhood Vaccines

To members of the Advisory Commission on Childhood Vaccines,

As organizations representing public health, older adults, patients, family caregivers, consumers, physicians, and other health care providers, we write to express our strong support for the Vaccine Injury Compensation Program (VICP) and urge the Advisory Commission on Childhood Vaccines (ACCV) to uphold the VICP's due process. We are concerned about this meeting being scheduled hastily, with only five business days given for written public comment over the holiday break.

The VICP was created to uphold the "grand bargain" by ensuring that, in exchange for broad vaccine access and liability protections for manufacturers, individuals who experience rare but serious vaccine-related injuries have access to compensation. The program is integral to vaccine infrastructure, and allows Americans to protect one another by taking vaccines, while also ensuring that biopharmaceutical companies continue to invest in vaccine clinical development.

[The VICP has been heralded as a success. As of 2023, almost 9,500 people have been paid more than \\$4.5 billion since the program's 1988 inception.](#) As stated by Dr. Reed Grimes—Director of the Division of Injury Compensation Programs in the Health Resources and Services Administration (HRSA)—at the [December 2025 ACIP meeting](#) (minutes forthcoming): "In the last five years, 77-78 percent of adjudicated claims have resulted in compensation, reflecting the program's deliberate policy choice to err on the side of fairness and efficiency for claimants while preserving vaccine confidence and supply."

While there are substantive updates that would help improve the program, any changes to the VICP must follow the requirements for notice and comment periods and allow for meaningful opportunities for public stakeholder input. The VICP plays an integral role in public trust and vaccine confidence, and modifications must be made through traditional and transparent processes.

Our organizations are also very concerned about efforts to add autism or autism symptoms to the Vaccine Injury Table. The VICP program was built on the principle of compensation

without causation, a fragile balance designed to sustain both trust and supply, and adding autism would collapse that distinction entirely. Federal estimates suggest up to 48,000 children could qualify immediately under a “profound autism” standard at an initial cost of nearly \$100 billion, followed by annual totals of about \$30 billion a year – [dwarfing the current \\$4 billion trust](#), a new analysis finds.

In addition, [multiple studies conducted in several different countries have demonstrated that there is no causal association between vaccines or their preservatives and autism spectrum disorder \(ASD\)](#). Vaccines do not change the timing of the onset of ASD symptoms, nor do they affect the severity of ASD symptoms. Vaccines are one of the greatest success stories in all of medicine, and the continued, baseless push to suggest otherwise needs to stop.

Sincerely,

Alliance for Aging Research
Alliance for Women’s Health and Prevention
American Families for Vaccines
America’s Physician Groups
American Association for Geriatric Psychiatry
American Association of Psychiatric Pharmacists (AAPP)
American Behcet’s Disease Association (ABDA)
American Geriatrics Society
American Pharmacists Association
Arkansas Immunization Action Coalition (Immunize Arkansas)
Big Cities Health Coalition
CaringKind, The Heart of Alzheimer’s Caregiving
Families Fighting Flu
Gerontological Society of America
Global Coalition on Aging
Global Healthy Living Foundation
HealthHIV
HealthyWomen
Illinois Public Health Association
Immunize Kansas Coalition
Immunize Wisconsin
Infectious Diseases Society of America

Looms For Lupus
Louisiana Families for Vaccines
Lupus Foundation of America
Mississippi Chapter of the American Academy of Pediatrics
National Association of Nutrition and Aging Services Programs
National Association of School Nurses
National Coalition for LGBTQ Health
National Consumers League
National Foundation for Infectious Diseases
National Hispanic Health Foundation
Neuropathy Action Foundation
Northern Utah Immunization Coalition
Partnership to Fight Infectious Disease (PFID)
RetireSafe
Village to Village Network
Voices of Alzheimer’s