



AMERICAN SOCIETY OF HEMATOLOGY

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September 11, 2025

Martin Kulldorff, PhD

Chair

Advisory Committee on Immunization Practices

Centers for Disease Control and Prevention

1600 Clifton Road NE

Atlanta, GA 30333

Re: Comments for the September 2025 Meeting of the Advisory Committee on Immunization Practices (Docket No. CDC-2025-0454)

Dear Dr. Kulldorff:

On behalf of the American Society of Hematology (ASH), thank you for the opportunity to provide comments in advance of the Advisory Committee on Immunization Practices' (ACIP) upcoming meeting during which the child and adolescent vaccine schedule will be discussed.

ASH represents more than 18,000 clinicians and scientists who are committed to the study and treatment of blood and blood-related diseases. These disorders encompass malignant hematologic disorders such as leukemia, lymphoma, and multiple myeloma, as well as non-malignant conditions such as sickle cell anemia, thalassemia, bone marrow failure, venous thromboembolism, and hemophilia. In addition, hematologists are pioneers in demonstrating the potential of treating various hematologic diseases and continue to be innovators in the field of stem cell biology, regenerative medicine, transfusion medicine, and gene therapy. Our mission is to foster high-quality care, transformative research, and innovative education to improve the lives of patients with blood and bone marrow disorders.

ASH urges ACIP to maintain the current child and adolescent vaccine schedule. Many individuals with hematologic conditions such as leukemia, lymphoma, sickle cell disease (SCD), and bone marrow failure syndromes are immunocompromised. The immune compromise can be a result of both the diseases themselves and the treatment administered; therapies like chemotherapy, bone marrow transplant, cellular therapies, and gene therapies can cause profound immune suppression, placing patients at heightened risk of unfavorable outcomes from infectious diseases that are preventable with vaccines. What may ordinarily be a minor viral or bacterial infection for patients with normal immune systems can become life-threatening for those with compromised immune systems. Access to and administration of vaccinations to reduce the risk of life-threatening infections for such hematology patients is essential. In addition, herd immunity from vaccination of as many members of society as possible protects the health of the American people.

Vaccines are also critical for individuals living with SCD. Affecting approximately 100,000 Americans, SCD is an inherited, lifelong disorder, which results in patients' red blood cells becoming rigid and sickle shaped. Sickle cells can get stuck in blood vessels and block blood flow, causing pain and organ infarctions. Complications of SCD include stroke, acute chest syndrome (a condition that lowers the level of oxygen in the blood), organ damage, chronic pain, other disabilities, and premature death. Immunization is crucial to mitigate infection-related complications in these individuals, and they require a comprehensive immunization strategy that includes both standard and additional vaccines. Vital vaccines

2025

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include pneumococcal conjugate, pneumococcal polysaccharide, meningococcal conjugate, serogroup B meningococcal, Hib, annual influenza, hepatitis A and B, and HPV, many of which are included in the current child and adolescent vaccine schedule. Because immune responses vary in this population, booster doses and additional vaccinations are required to ensure optimal protection.ⁱ Any barriers to access to vaccines has the potential to undermine the health of this already vulnerable population.

Another group of hematology patients that benefits immensely from vaccinations are those who have undergone surgical removal of the spleen, or splenectomy, for any reason. Splenectomy is occasionally performed for reasons like trauma to the spleen, autoimmune disorders, or hereditary disorders where the spleen is causing problems. Patients who have undergone splenectomy are at risk for life-threatening bacterial infectionsⁱⁱ. Vaccination of such patients is critical to reduce the morbidity and mortality that can occur in patients who have had splenectomy.

Additionally, those who are immunocompromised cannot safely receive certain live vaccines including the combined vaccine for measles, mumps, and rubella (MMR), and varicella. Immunocompromised individuals depend on the protection they receive from the vaccines that are safe for them to receive and the general population's immunity resulting from widespread vaccination. Should ACIP recommend changes to the child and adolescent vaccine schedule, immunocompromised individuals will be placed at greater risk of vaccine-preventable illnesses because of declining vaccination rates in the general population. This will result in more severe illnesses in this group, hospitalization, and potentially even death. The current vaccine schedule is a critical public health safeguard for those who rely most on community protection.

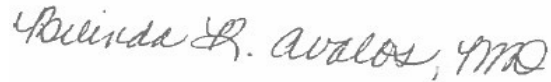
Specifically, ASH wishes to address the COVID-19 vaccines and their availability for the patients our members treat. We stand with our colleagues at the American Academy of Pediatrics (AAP) and the American Academy of Family Physicians (AAFP), who have recently issued statements recommending COVID-19 vaccination for nearly all individuals—not only those with high-risk conditions.^{iiiiv} Individuals with blood disorders – both who are and are not immunocompromised – are a higher risk for severe COVID-19 and may not be able to clear the virus quickly and efficiently. Vaccinations are a fundamental prevention strategy in hematologic patients with booster doses recommended for these individuals.^v ASH is very concerned about the Food and Drug Administration's (FDA) new recommendations for the latest COVID-19 boosters, which narrowed their use for younger adults and children to those with at least one high-risk condition. Additionally, the FDA removed one of the two vaccines available for young children. Individuals with blood cancers or those who are taking immunosuppressive drugs will continue to be eligible for boosters under this new approval. However, this recommendation has already resulted in many individuals unable to receive the vaccine due to the new qualifications. ASH is extremely concerned about the implications for patients with hematologic conditions and urges ACIP to not further restrict their access for Americans. All Americans should have the opportunity to evaluate their risk and the risk to their loved ones and have the choice to receive these vaccines without additional access and financial barriers.

Vaccinations are also important for family members and close contacts of individuals with blood disorders because they provide an additional layer of protection for the immunocompromised individual who may have a diminished immune response. By staying up to date with recommended vaccines, family members help reduce the risk of introducing infectious diseases into the home. This approach creates a safeguard around the immunocompromised person, lowering their risk of exposure and serious illness.

The protection afforded by vaccines is particularly important to individuals with hematologic disorders. Therefore, ASH urges ACIP not to amend the child and adolescent vaccine schedule, resulting in restricting access for Americans who choose to vaccinate their children. Should you have any questions or require

additional information, please contact ASH Director of Government Relations and Public Health Stephanie Kaplan (skaplan@hematology.org or 202-776-0544).

Sincerely,



Belinda Avalos, MD
ASH President

ⁱ Obeagu EI, Obeagu GU. Immunization strategies for individuals with sickle cell anemia: A narrative review. *Medicine* (Baltimore). 2024 Sep 20;103(38):e39756. doi: 10.1097/MD.00000000000039756. PMID: 39312357; PMCID: PMC11419550.

ⁱⁱ Charlbi Dean's cause of death linked to a decade-old surgery - Los Angeles Times

ⁱⁱⁱ American Academy of Pediatrics Announces Fall Immunization Recommendations, Reaffirming Commitment to Vaccine Safety and Public Health

^{iv} American Academy of Pediatrics Recommendations for COVID-19 Vaccines in Infants, Children, and Adolescents: Policy Statement

^v Fattizzo B, Rampi N, Barcellini W. Vaccinations in hematological patients in the era of target therapies: Lesson learnt from SARS-CoV-2. *Blood Rev.* 2023 Jul;60:101077. doi: 10.1016/j.blre.2023.101077. Epub 2023 Mar 28. PMID: 37029066; PMCID: PMC10043962.