



AMERICAN COLLEGE OF
OCCUPATIONAL AND
ENVIRONMENTAL MEDICINE

July 16, 2025

Center for Infectious Disease Research and Policy (CIDRAP)
Attn: Vaccine Integrity Project
Research and Innovation Office
University of Minnesota
420 Delaware St. SE
MMC 263, C315 Mayo
Minneapolis, MN 55455

Dear Members of the Vaccine Integrity Project:

I am reaching out as President of the American College of Occupational and Environmental Medicine (ACOEM). ACOEM is a medical specialty society representing more than 3,200 physicians and other healthcare providers who practice occupational and environmental medicine (OEM), the preventive medicine specialty that provides clinical care to workers and advises employers on policies and practices to advance workplace safety and worker health and well-being. Our members also have expertise in internal medicine, infectious diseases, and public health and population medicine.

We commend the Center for Infectious Disease Research and Policy (CIDRAP) for swiftly assembling a team of experts committed to protecting the integrity and effectiveness of vaccines in the United States. The recent restructuring of the Centers for Disease Control and Prevention's (CDC) Advisory Committee on Immunization Practices (ACIP), along with growing hesitancy surrounding vaccines, is deeply concerning and poses a serious threat to public health by increasing the risk of vaccine-preventable illnesses and deaths.

We note that the Vaccine Integrity Project has been in discussions with healthcare providers, public health stakeholders, and professional associations – including the American Academy of Pediatrics, American Academy of Family Physicians, and others. We would welcome the opportunity for ACOEM to nominate a representative to participate in future discussions focused on vaccine policy and recommendations.

We believe that ACOEM's expertise and unique perspective as the Nation's largest medical specialty society devoted to the health and safety of U.S. workers will enhance the Vaccine Integrity Project's mission. As a significant portion (more than 50%) of the U.S. population is employed, inclusion of a representative voice from the medical specialty that serves working Americans would provide the Vaccine Integrity Project with valuable insights and feedback from the front lines of employer vaccination programs. In addition, none of the newer

communications from CDC, ACIP, or the Food and Drug Administration (FDA) address occupational risks of vaccine preventable disease nor specific recommendations for healthcare professionals or other worker populations.

Since October 2021, ACOEM has been partnering with the Council of Medical Specialty Societies and five other specialty societies as part of a cooperative grant from the CDC focused on increasing vaccine acceptance for COVID-19, flu, and other adult immunizations. We have collaborated with six health systems and large employers to implement quality improvement initiatives to increase immunization uptake among working adults (see: <https://www.acoemvaxinfo.org/>).

ACOEM participates as a liaison member on CDC's Advisory Committee for the Elimination of TB and the Hospital Infection Control and Prevention Advisory Committee (HICPAC) (until HICPAC's recent dissolution). Prior to the recent disbanding of ACIP, ACOEM had requested to add a liaison member to the ACIP to provide expertise on the risk of vaccine-preventable diseases in occupational groups and insights into necessary considerations for workplace vaccine programs. This need for this perspective was highlighted with the rollout of COVID-19 vaccine and continues to be relevant for other vaccines with occupational transmission risks.

Our members are responsible for the health and safety of workers in both the public and private sectors and provide medical direction to occupational health and safety programs, serve as corporate medical directors across all sectors of the U.S. economy, and deliver clinical care to workers in a variety of settings. Our members' interests and expertise encompass a wide range of workers and worksites including first responders and all health care workers to manufacturing, the military, and all segments of the transportation industry.

Infectious diseases in the community impact the workplace and vice versa. Our members are engaged in the development and management of workplace policies and programs to support public health objectives, including immunization recommendations. We interpret and explain immunization recommendations, vaccine science, and employer policy requirements to affected workers, supervisors, and organizational leaders.

The employer-employee relationship is a delicate one, subject to a regulatory landscape our members know well, which differs greatly from the provider-patient relationship. ACOEM members understand not only the occupational factors that impact risk of various infectious diseases in workers, but also the implications of employment laws and industry-specific regulatory requirements that employers must consider when designing occupational vaccination programs and establishing requirements.

ACOEM would appreciate the opportunity to consult with VIP on current and future vaccine recommendations. We would also like to nominate a qualified physician with expertise in immunization and occupational vaccination programs to participate in the Vaccine Integrity Project's work in any capacity you deem appropriate. We appreciate your consideration and look forward to your response.

If you need additional information or have any questions, please contact Julie Ording, MPH, Director of Scientific Affairs at julie@acoem.org or 224-265-6782.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laura Gillis', with a horizontal line extending from the end of the signature.

Laura Gillis, MD, MPH, FACOEM
President, ACOEM