

August 26, 2026

Cynthia Goss

Deputy Assistant Secretary for Planning and Evaluation (Health Policy)

Performing the Delegable Duties of the Assistant Secretary for Planning and Evaluation

Office of the Secretary, Department of Health and Human Services

200 Independence Avenue SW

Washington, DC 20201

Submitted electronically

Re: Request to Extend the Comment Period to October 23, 2026; Docket No. HHS–OS–2026–0332, *Request for Information: Categories Used in Federal Vaccine Recommendations and the Role of Shared Clinical Decision-Making*

Dear Ms. Goss,

On behalf of the undersigned organizations, we respectfully request that the Department of Health and Human Services extend the comment period for the above-referenced Request for Information from September 20, 2026, to October 23, 2026.

This initial response is procedural only and does not express a position on the substantive matters presented in the RFI. The notice seeks input on the categories used in federal vaccine recommendations and many related considerations, including the appropriate approach when randomized controlled trial evidence is limited or absent, the consequences of assigning a recommendation category, and practices for communicating recommendations to clinicians, patients, and the public.

The comment period provided does not allow stakeholders enough time to gather information and provide thoughtful responses. Notice was published in the Federal Register on August 24, 2026, and establishes September 20 as the deadline. This provides our organizations less than 30 days to assess the RFI, consult their members and experts, and develop a complete response. Extending the deadline to October 23 would provide approximately 60 days following publication and would significantly improve the quality and comprehensiveness of the information available to HHS.

We therefore respectfully urge HHS to extend the deadline for responses to October 23, 2026. Such an extension would be consistent with recent HHS practice. In February

2026, the Health Resources and Services Administration extended the comment period for its 340B Rebate Model Pilot Program RFI from 30 days to 60 days to provide stakeholders additional time to submit meaningful comments regarding operational, financial, and patient-access impacts. The Food and Drug Administration similarly extended a 30-day RFI comment period by an additional 30 days in response to an extension request, concluding that the additional time would afford interested stakeholders adequate time to respond.

The requested extension, which is consistent with the 60-day comment periods commonly afforded under federal agency RFIs and rulemaking efforts, would allow physician organizations and other affected stakeholders to provide more thoughtful, representative, and useful input. A fuller administrative record will better inform HHS's evaluation of the clinical, operational, legal, and programmatic matters raised in the RFI. For these reasons, we respectfully request that HHS extend the comment deadline for Docket No. HHS–OS–2026–0332 to October 23, 2026, and announce the extension as soon as practicable.

Thank you for considering our request. If you have any additional questions or would like to discuss further, please contact David Tully with the American Academy of Family Physicians at dtully@aaafp.org.

Sincerely,

Alliance for Aging Research
American Academy of Family Physicians
American Academy of Pediatrics
American Academy of Physician Associates
American Association for the Study of Liver Diseases
American Association of Colleges of Pharmacy
American Association of Nurse Practitioners
American College of Emergency Physicians
American College of Nurse-Midwives
American College of Obstetricians & Gynecologists
American College of Osteopathic Family Physicians (ACOFP)
American College of Physicians
American College of Preventive Medicine
American Families for Vaccines
American Lung Association
American Medical Association
American Nurses Association

American Osteopathic Association
American Pharmacists Association
American Public Health Association
American Society for Meningitis Prevention
American Society of Hematology
American Society of Pediatric Nephrology
American Thoracic Society
America's Physician Groups
Arkansas Immunization Action Coalition (Immunize Arkansas)
Association for Prevention Teaching and Research
Asthma and Allergy Foundation of America
Autistic Self Advocacy Network
Benton County Public Health
Big Cities Health Coalition
Cancer Nation
Caregiver Action Network
Center for Disease Analysis Foundation
Color of Gastrointestinal Illnesses
Delaware Academy of Medicine and Public Health
Doctors for America
Gerontological Society of America
HealthyWomen
HIV Medicine Association
Immune Deficiency Foundation
Immunization Coalition of Delaware
Immunize.org
Indiana Immunization Coalition
Infectious Diseases Society of America
Kimberly Coffey Foundation
National Association of Pediatric Nurse Practitioners
National Association of School Nurses
National Coalition for Infant Health
National Foundation for Infectious Diseases
National Organization for Dental Immunizers
National Public Health Coalition
North American Society for Pediatric Gastroenterology, Hepatology and Nutrition
NTM Info & Research
NVax: Nevada's Immunization Coalition

Oregon Public Health Association
Partnership to Fight Infectious Disease
Pediatric Infectious Diseases Society
PREEMIEWORLD FOUNDATION
Pro-Vaccine Legal Alliance
RetireSafe
Society for Healthcare Epidemiology of America
Society for Maternal-Fetal Medicine
Society for Public Health Education
Society of Infectious Diseases Pharmacists
The Arizona Partnership for Immunization
Trusted Messenger Program
Vaccinate Your Family
Voices for Vaccines
Voices of Alzheimers