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March 12, 2026

Advisory Committee on Immunization Practices  
1600 Clifton Road NE  
Atlanta, GA 30329

**Re: Society for Maternal-Fetal Medicine Public Comment to ACIP**

Docket No. CDC-2026-0199  
*Submitted Electronically via Federal Register*

**Introduction**

On behalf of the Society for Maternal-Fetal Medicine (SMFM), we thank the Advisory Committee on Immunization Practices (ACIP) for this opportunity to submit public comments. SMFM represents over 6,500 members dedicated to optimizing care for high-risk pregnancies through advocacy, education and research. We are committed to the use of evidence-based medicine to optimize pregnancy outcomes.

**Methodology**

SMFM has historically aligned its immunization recommendations with the schedule developed by the Centers for Disease Control and Prevention's (CDC) and informed by the deliberations of the ACIP. ACIP's recommendation process prioritizes rigorous and transparent evaluation of the highest quality available. This process incorporates two structured frameworks: Grading of Recommendations, Assessment, Development and Evaluation (GRADE) and Evidence to Recommendation (EtR). Together, these methodologies improve transparency, consistency, rigor and equity in vaccine policy development.<sup>1</sup> Additionally, this recommendation process evaluates benefits and risks, costs, stakeholder perspectives, and implementation feasibility.<sup>1</sup> These considerations are critical when setting national immunization policy and guidelines to ensure maximal population health benefits while ensuring safety and public trust. Lastly, the EtR framework has typically included the input of high-risk pregnancy experts from our society who have experience in infectious diseases during pregnancy.

We advocate for the return to use of GRADE and EtR frameworks for the development of all future ACIP recommendations. We also advocate for the inclusion of high-risk pregnancy experts from our society when assessing pregnancy related vaccinations.

*Maternal Immunization*

Additionally, the use of GRADE and EtR aligns closely with SMFM's guideline development process, enabling SMFM to reliably endorse ACIP's recommendations regarding maternal immunizations.

In 2013, SMFM adopted the GRADE methodology for evidence-based recommendation development.<sup>2</sup> Because both organizations rely on shared methodological framework, SMFM vaccine recommendations have historically aligned with those issued by ACIP. This



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approach ensures SMFM vaccine guidance is informed by a systematic evaluation and synthesis of available evidence, incorporates standardized assessment of evidence strength and quality, and minimizes the potential influence of scientific bias.

**Maternal Immunization is Safe and Effective**

Maternal immunization plays a crucial role in protecting the mother and infant from vaccine-preventable diseases during pregnancy and in the early stage of the infant's life. Immunization against vaccine-preventable diseases, including RSV, pertussis, flu, and COVID-19, is safe and continues to be the most effective strategy to reduce serious, long-term maternal, fetal, and infant health complications, hospitalizations, and death. SMFM continues to recommend these safe and effective vaccinations during pregnancy.

**Closing Remarks**

As the voice of maternal-fetal medicine, SMFM is uniquely positioned to contribute to the proposed working group on vaccines in pregnancy. The inclusion of SMFM ensures that high-risk pregnancy experts can offer critical insights grounded in rigorous clinical evidence. Our experts can provide thoughtful, nuanced contributions to all deliberations on vaccines in pregnancy. Together, we can drive meaningful progress towards our shared vision for healthy maternal-fetal outcomes.

Thank you for this opportunity to provide public comments. Please direct any follow-up or questions to Megan McReynolds, SMFM's Senior Director of Public Health Initiatives (mmcreynolds@smfm.org).

Sincerely,

*Beth Steele*

Beth Steele  
Executive Vice President and Chief Program Officer, SMFM

CC:  
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1. Lee G, Carr W. Updated Framework for Development of Evidence-Based Recommendations by the Advisory Committee on Immunization Practices. *MMWR Morb Mortal Wkly Rep.* Nov 16 2018;67(45):1271–1272. doi:10.15585/mmwr.mm6745a4
2. Norton ME, Kuller JA, Metz TD. Society for Maternal-Fetal Medicine Special Statement: Grading of Recommendations Assessment, Development, and Evaluation (GRADE) update. *Am J Obstet Gynecol.* Apr 2021;224(4):B24–b28. doi:10.1016/j.ajog.2020.12.1200