



May 27, 2026

VIA ELECTRONIC TRANSMISSION

Dockets Management Staff (HFA-305),
Food and Drug Administration,
5630 Fishers Lane, Rm. 1061,
Rockville, MD, 20852

Re: Comments for the May 28, 2026 Meeting of VRBPAC (Docket No. FDA-2026-N-3962).

Dear Cicely Reese:

On behalf of the Governors Public Health Alliance (PHA), we appreciate the opportunity to submit comments on the items before the Food and Drug Administration (FDA)'s Vaccines and Related Biological Products Advisory Committee (VRBPAC) for its May 28, 2026, meeting. As a nonpartisan coalition of 15 governors representing approximately one-third of the American population, PHA is committed to protecting and advancing the health and wellbeing of all Americans.¹

The decisions made by VRBPAC have far-reaching implications for public health and Americans' ability to access safe and effective vaccines. As governors responsible for implementing public health policy and managing state healthcare systems, we have witnessed firsthand how COVID-19 vaccination has protected our communities and reduced the burden of serious illness, hospitalization, and death. We write to urge the Committee to maintain recommendations grounded in scientific rigor and transparent deliberative processes.

The strength of VRBPAC recommendations has historically rested on established scientific methods, using established evidence evaluation frameworks and the full and transparent presentation of relevant and validated data. We strongly urge the Committee to rely on all available and substantiated evidence when advising on the 2026-2027 COVID-19 vaccine formula, and to apply consistently the Benefit-Risk Assessment (BRA), which ensures transparency by clearly articulating the balance of benefits and harms, the type and quality of evidence, and the values and preferences of affected populations. In doing so, the Committee would be supporting equitable and timely access so that all individuals who choose to be vaccinated are able to do so without difficulty. Additionally, this transparency will help to build and maintain foundational public trust

¹ PHA membership includes California Governor Gavin Newsom, Colorado Governor Jared Polis, Connecticut Governor Ned Lamont, Delaware Governor Matt Meyer, Guam Governor Lou Leon Guerrero, Hawai'i Governor Josh Green, Illinois Governor JB Pritzker, Maryland Governor Wes Moore, Massachusetts Governor Maura Healey, New Jersey Governor Mikie Sherrill, New York Governor Kathy Hochul, North Carolina Governor Josh Stein, Oregon Governor Tina Kotek, Rhode Island Governor Daniel McKee, and Washington Governor Bob Ferguson.



in VRBPAC's recommendations, helping to increase vaccination rates and keep our communities safe.

We also want to submit for the record that we are deeply concerned by recent reports that FDA officials blocked the publication of multiple studies conducted by the agency's own scientists using millions of patient records that found serious side effects from COVID-19 vaccines to be rare.² Two studies that had been accepted for publication in peer-reviewed medical journals were reportedly withdrawn in October 2025 after scientists were directed to pull them.³ The suppression of taxpayer-funded safety findings undermines the scientific integrity underpinning FDA processes, putting public health at risk.

The states represented by the PHA are committed to ensuring that our residents have access to safe and effective COVID-19 vaccines. We urge VRBPAC to demand full transparency in the evidence presented to the committee and call on FDA leadership to ensure that all relevant scientific findings are available to inform VRBPAC's work. We further urge the Committee to ensure that its review of the 2026-2027 COVID-19 vaccine formula is conducted in accordance with accepted and rigorous scientific methods and evidence-based standards, so that the resulting recommendations can be relied upon by states and the public alike.

Respectfully submitted,

Angela Botticella
Managing Director
Governors Public Health Alliance

² Christina Jewett, *F.D.A. Blocked Publication of Research Finding Covid and Shingles Vaccines Were Safe*, N.Y. TIMES (May 5, 2026), <https://www.nytimes.com/2026/05/05/us/politics/fda-covid-vaccine-studies.html>.

³ *Id.*