

November 3, 2021

Centers for Disease Control and Prevention
Department of Health and Human Services
1600 Clifton Road NE, MS H24-8
Atlanta, Georgia 30329-4027
Attn: ACIP Meeting.

**Re: EPPC Scholar Comment for Advisory Committee on Immunization Practices
(ACIP) Meeting, November 2-3, 2021, Docket No. CDC-2021-0112**

Dear Advisory Committee on Immunization Practices:

My name is Rachel Morrison. I am an attorney and policy analyst at the Ethics and Public Policy Center (EPPC), where I work on EPPC's HHS Accountability Project. Thank you for the opportunity to provide written public comment to ACIP.

As you know, vaccines are important medical interventions to combat diseases. As such, ACIP should be looking for ways to provide access to every person in the U.S. who wishes to be vaccinated as a matter of public health. There is, however, one group that has been marginalized, discriminated against, and overlooked in the U.S.'s vaccination programs. That group is those who wish to vaccinate but cannot because they hold sincere religious or conscience objections to receiving vaccines that have connections to aborted fetal cell lines.¹

Unfortunately, several of the most common vaccines in the U.S. were produced or tested using aborted fetal cell lines.² This includes *all* vaccines available in the U.S. for COVID-19, as well as for Hepatitis A, Rubella (MMR), and Chickenpox.³

Earlier this year HHS year took steps to provide access to some of these vaccines for those who have religious and conscience objections, yet still wish to be vaccinated against serious diseases, by allowing importation of versions of the vaccine manufactured abroad that are

¹ See, e.g., Children of God for Life, <https://cogforlife.org> (pro-life group campaigning for ethical vaccines that preserve the dignity of human life).

² *Cell Lines Used for Viral Vaccine Production*, CHARLOTTE LOZIER INST. (Jan. 4, 2021), <https://lozierinstitute.org/cell-lines-used-for-viral-vaccine-production/>; CHILDREN OF GOD FOR LIFE, ABORTION-TAINTED VACCINES FOR US AND CANADA AND ETHICAL ALTERNATIVES, <https://cogforlife.org/wp-content/uploads/Abortion-Tainted-Vaccines.pdf>.

³ David Prentice & Tara Sander Lee, *What You Need to Know About the COVID-19 Vaccines*, CHARLOTTE LOZIER INST. (Dec. 8, 2020), <https://lozierinstitute.org/what-you-need-to-know-about-the-covid-19-vaccine/> (last updated June 2, 2021); *Cell Lines Used for Viral Vaccine Production*, CHARLOTTE LOZIER INST. (Jan. 4, 2021), <https://lozierinstitute.org/cell-lines-used-for-viral-vaccine-production/>; CHILDREN OF GOD FOR LIFE, ABORTION-TAINTED VACCINES FOR US AND CANADA AND ETHICAL ALTERNATIVES, <https://cogforlife.org/wp-content/uploads/Abortion-Tainted-Vaccines.pdf>.

untainted by abortion. Specifically, after HHS received complaints from health care providers and patients, it created an exception to the Food, Drug, and Cosmetic Act's bar on importing certain non-FDA-licensed vaccines for Measles, Rubella, and Hepatitis A because the ban "substantially burden[ed] their exercise of religion in violation of the Religious Freedom Restoration Act (RFRA)."⁴

I urge ACIP to consider ways to incentivize, procure, and require production of vaccines that do not have connections to aborted fetal cell lines so that *everyone* in the U.S. that desires a vaccine to prevent serious disease in themselves and others can receive one without violating their conscience or religious beliefs. Certainly, this administration's commitment to equity for religious minorities⁵ and widespread vaccination requires nothing less.

Sincerely,

A handwritten signature in black ink that reads "Rachel Morrison". The signature is written in a cursive, flowing style.

Rachel N. Morrison, Esq.
Policy Analyst | HHS Accountability Project
Ethics & Public Policy Center

⁴ Limited Waiver Under the Religious Freedom Restoration Act Regarding Access to Certain Vaccines from Japan, Office for Civil Rights, U.S. Dep't of Health & Human Servs., <https://www.hhs.gov/sites/default/files/limited-waiver-under-the-religious-freedom-restoration-act-regarding-access-to-certain-vaccines-from-japan.pdf>.

⁵ See, e.g., Advancing Racial Equity and Support for Underserved Communities Through the Federal Government, Exec. Order No. 13985, 86 Fed. Reg. 7009 (Jan. 20, 2021), <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/> ("equity" means the consistent and systematic fair, just, and impartial treatment of all individuals, including ... members of religious minorities").