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The Classification “Shared Clinical Decision Making” Should Not Be Extended to More Federal Vaccine Recommendations And Should Be Used Only In Very Limited Circumstances, Lest It Undermine Use of and Trust In Vaccines, Says America’s Physician Groups

Washington, DC, September 21, 2026 – The federal government should not extend the classification of “shared clinical decision making” (SCDM) in the context of federal vaccine recommendations and should limit the classification to only a very few vaccines and under very limited circumstances, America’s Physician Groups (APG) said in a [response](#) filed yesterday (Sept. 20) to a [request for information](#) from the Department of Health and Human Services (HHS). Otherwise, the use of SCDM when officially attached to vaccine recommendations will only serve to undermine use of and trust in vaccines and lead to avoidable illness and death.

America’s Physician Groups, the organization representing more than 300 physician groups engaged in accountable or “value-based” care, has repeatedly stressed that prevention is key to this care model, and that approved and recommended vaccines are key to prevention. “Diminishing the important prevention tool of vaccines – which would be accomplished by attaching the SCDM classification to many more vaccines – would impede the delivery of health care that is accountable for costs and quality and imperil individuals’ health and wellbeing,” said APG’s President and Chief Executive Officer, Susan Dentzer. “The nation’s children, adults, and the U.S. health care system deserve far better.”

APG wrote in its response to the RFI that it believes that it is essential to distinguish between the important and regular use of shared clinical decision making (SCDM) in routine clinical practice involving the administration of vaccines, and the separate HHS and Centers for Disease Control and Prevention (CDC) efforts to attach SCDM to specific federal vaccine recommendations. APG criticized actions taken previously by HHS and CDC to cease classifying vaccines for rotavirus, influenza, hepatitis A and B, meningococcal vaccines, and COVID as universal and routinely recommended for children (and in some cases, for adults), and to recategorize them as being subject to SCDM. APG pointed out that there was no scientific basis whatsoever to change the classification, given the proven effectiveness of the vaccines in reducing illness, hospitalization, and death. Although these actions have been stayed for now by a federal district court, APG believes that they nonetheless constituted an effort to muddy the science around vaccines and undermine use and take-up of approved and recommended vaccines. The current measles outbreak, which has been linked broadly to many unvaccinated individuals, illustrates the substantial risks and likely consequences, APG wrote.

APG also wrote that it believes that the classification of SCDM should be attached to only a very few vaccines and under very limited circumstances, as is the case now. The classification should be used only in the relatively rare instances in which the science supports it due to considerations of so-called clinical equipoise, in that there is genuine uncertainty within the expert medical community about the preferred intervention or treatment. Otherwise, the use of SCDM when officially attached to vaccine recommendations will only serve to undermine use of and trust in vaccines and lead to avoidable illness and death.

Physicians, such as those represented by APG, are patients’ best source of information about vaccines, as are the recommendations of esteemed medical groups such as the American Academy of Pediatrics. APG continues to stand by its allies among such groups in defending the scientific basis and use of approved and recommended vaccines.

About America’s Physician Groups

APG’s more than 300 physician groups comprise approximately 260,000 physicians and other clinician providing care to nearly 90 million patients, including about 1 in 4 Americans and 1 in 3 Medicare Advantage enrollees. APG’s motto, ‘Taking Responsibility for America’s Health,’ represents our members’ commitment to clinically integrated, coordinated, value-based health care in which physician groups are accountable for the costs and quality of patient care. Visit us at [#](http://www.apg.org)

