



National Association of Nutrition and Aging Services Programs

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February 21, 2024

Ms. Stephanie Thomas
Advisory Committee on Immunization Practices (ACIP) Meeting
Centers for Disease Control and Prevention (CDC)
1600 Clifton Road NE, MS H24-8
Atlanta, Georgia 30329-4027
Attn: Docket No. CDC-2024-0001

Dear Ms. Thomas and Members of the Committee:

The National Association of Nutrition and Aging Services Programs (NANASP) appreciates the opportunity to submit a comment for consideration for your upcoming meeting on February 28 and 29, 2024. We are writing to express our deep concern regarding the impact of shared clinical decision-making requirements on access to Respiratory Syncytial Virus (RSV) vaccines for older adults.

The existence of RSV vaccines marks a significant advancement in preventive and protective healthcare for older adults. It was a barrier before not to have a RSV vaccine that existed, and now it's more of a barrier that older adults have to face unnecessary obstacles in receiving it. The shared clinical decision-making adds complexity and hurdles, making it increasingly burdensome for those who need it most. This, in turn, can significantly impact vaccine uptake rates among older adults.

The CDC reported that as many as 160,000 older Americans are hospitalized for RSV-related illnesses, with nearly 10,000 fatalities attributed to the virus each year. Despite these trends, the CDC reported on February 16, 2024, that only 21.9% of adults age 60 and older reported receiving the RSV vaccine¹. It's puzzling that we possess the necessary tools to address these concerning statistics, yet shared clinical decision-making impedes their effective use. The current shared decision-making approach prevents the full utilization of available resources, potentially putting more older adults at risk of hospitalization due to RSV-related illnesses.

¹ Vaccination trends-adults. (2024). Retrieved from <https://www.cdc.gov/respiratory-viruses/data-research/dashboard/vaccination-trends-adults.html#:~:text=The%20percent%20of%20adults,Friday%2C%20February%2016th%2C%202024.>

Furthermore, pharmacies play a crucial role in healthcare access, often being more accessible for older adults compared to primary care offices. Pharmacists see their customers far more frequently than other clinicians, allowing older adults more opportunity and “face time” to ask questions and gain information on vaccines. Pharmacies became the nation’s leading provider* of the COVID-19 vaccine, and can continue to lead in vaccinating older adults against RSV.

We urge the committee to prioritize eliminating barriers to RSV vaccines, such as shared clinical decision making, that will lead to increased vaccine uptake rates and better protect older adults.

If you have any questions, please feel free to reach out to me directly at (202) 789-0470 or rblancato@matzblancato.com.

Sincerely,

A handwritten signature in blue ink that reads "Bob Blancato". The signature is written in a cursive, flowing style.

Bob Blancato
Executive Director
NANASP