June 24, 2021

Advisory Committee on Immunization Practices (ACIP)
Centers for Disease Control and Prevention
1600 Clifton Road NE, MS H24-8
Atlanta, Georgia 30329-4027
Attn: June ACIP Meeting

Re: Docket No. CDC-2021-0034

Submitted electronically via regulations.gov

To the Committee:

I am writing today to urge the Advisory Committee on Immunization Practices (ACIP) to schedule a special meeting to consider and recommend the use of new and improved pneumococcal vaccines in advance of the start of the 2021 flu and pneumonia season. I am joined in support of this request by the National Council on Aging, the National Alliance for Caregiving, the National Hispanic Council on Aging, the National Association of Area Agencies on Aging, the National Caucus and Center on Black Aging, Generations United, the Caregiver Action Network, the Vietnam Veterans of America, and the Women’s Institute for a Secure Retirement.

Our main concern is that a more active influenza and pneumonia season is inevitable. In fact, CDC epidemiologist Sonia Olsen said in a New York Times article in April, “We do not know when [influenza] will come back in the United States, but we know it will come back.”

Pneumonia is inextricably linked to the flu. In the United States, 1.5 million people per year seek care from hospital emergency departments because of pneumonia and approximately 50,000 influenza and pneumonia victims die—the ninth leading cause of death in the U.S. overall. While pneumonia can attack people of all ages, older adults account for a greater portion of this number. They are especially vulnerable because the strength of the body’s immune system declines over time just as serious chronic illnesses become more prevalent.

Two new and improved pneumococcal vaccines could be approved by the Food and Drug Administration (FDA) by the end of next month—one has already been approved by the FDA and the other is being considered on July 18. Coverage by Medicare for these vaccines will be
vital. In 2014, when you recommended use of the PCV-13 vaccine, the Centers for Medicare and Medicaid Services (CMS) followed your recommendation within just a few months and approved coverage for the vaccine under Medicare. This step alone led to a doubling in the number of older adults getting vaccinated against pneumonia in the first year. ACIP acted in response to an increased number of pneumonia cases among older adults at that time. Even if anticipatory at the present time, the urgency to be proactive again with the best available pneumococcal vaccine cannot be stressed enough.

The nation is grateful for the tireless work that the ACIP has done with respect to reviewing and approving covid-19 vaccines. Your work has been a significant part of a remarkable American accomplishment which has resulted in 177.1 million Americans having received at least one covid-19 vaccine to date. We contend that for the health of the older adults we serve, the urgency to quickly recommend an upgraded pneumococcal vaccine is comparable, and we believe that your recommendation will result in more older adults getting the necessary vaccinations to prevent pneumonia.

Your recommendation will also address another important public health issue—preventing further social isolation of older adults. Those who are vaccinated as we have seen with covid-19 are more able and confident about resuming life beyond sheltering at home. Increased protection of older adults such as this can also reduce stress on family caregivers. As a nation, we must encourage this trend to continue.

We hope we have conveyed our concerns to you. We want to continue to see our nation emerge from the pandemic and become stronger again. To ensure that continues, let us take the genuine threat of flu and pneumonia seriously and be prepared to offer the best possible vaccines for prevention.

Sincerely,

Robert Blancato
Executive Director
NANASP