



NATIONAL CONSUMERS LEAGUE

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February 19, 2019

José R. Romero, MD, FAAP, Chair
Advisory Committee on Immunization Practices
Centers for Disease Control and Prevention
1600 Clifton Road, N.E., Mailstop A27
Atlanta, GA 30329-4027

RE: Docket No. CDC-2019-0002; Advisory Committee on Immunization Practices (ACIP)

Dear Dr. Romero and Members of the Advisory Committee on Immunization Practices:

On behalf of the National Consumers League (NCL), I am writing to strongly urge you to retain the ACIP recommendation for coverage of the pneumococcal vaccine for adults ages 65+. Founded in 1899, the National Consumers League is the nation's pioneering consumer advocacy organization. NCL is a strong supporter of vaccines and works to educate consumers about the importance of vaccines and dispel the myths about vaccine safety.

As you know, CDC currently recommends that all adults age 65+ be vaccinated with both the pneumococcal conjugate (PCV13) vaccine and the pneumococcal polysaccharide (PPSV23) vaccine. These two vaccines have been proven to protect against pneumonia, meningitis, and bacteremia. As a result of ACIP's 2014 and 2015 pneumococcal vaccine recommendations and Medicare coverage of these vaccines, 60 percent of the total United States population has been vaccinated against pneumococcal disease. However, this figure falls well below the Healthy People 2020 target of 90 percent of noninstitutionalized adults aged 65+ who are vaccinated against pneumococcal diseases. In order to continue to make strides towards achieving the Healthy People 2020 goal, Medicare coverage must be maintained, which depends upon a positive recommendation from ACIP.

According to the National Center for Health Statistics, influenza and pneumonia are the 8th leading cause of death in the United States, with approximately 18,000 older adults dying from pneumonia annually. In order to stem the tide of deaths from these vaccine-preventable diseases, strong vaccination recommendations must be maintained. ACIP must not cause a vaccination backslide by changing its recommendation for adults 65+ to get the pneumococcal vaccines.

Furthermore, as noted in the National Hispanic Council on Aging letter which NCL joined as a signatory, a reversal of ACIP's recommendation for the pneumococcal vaccine "would disproportionately affect communities of color whose vaccination rates are well below the national average but have risen with Medicare coverage." Reversal of ACIP's recommendation would only serve to exacerbate this disparity in vaccination rates.

As ACIP conducts its deliberations, NCL urges the Committee to maintain the recommendation for coverage of the pneumococcal vaccine for adults ages 65+. This recommendation serves to protect and advance the health of our nation's seniors. For our part, NCL will continue to educate consumers about the importance of vaccines in protecting the public health, and work to dispel the myths about the safety of vaccines.

Thank you for your consideration of our views on this important public health issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Sally Greenberg". The signature is fluid and cursive, with a large initial "S" and "G".

Sally Greenberg, Executive Director