



June 18, 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-2019-0028; Advisory Committee on Immunization Practices (ACIP)**

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

My name is Sally Greenberg and I am here today on behalf of the National Consumers League (NCL). Thank you for what you do for the health and well-being of all Americans and for the opportunity to speak here today.

We are passionate about vaccines for a reason. The League was founded in 1899 and our first leader, General Secretary Florence Kelley, described the devastating effects for her family in losing several relatives to diphtheria.

I grew up with an uncle, my mother's older brother, who suffered the effects of polio, which he contracted in 1953 before the Salk Vaccine became available. He spent the remainder of his life in a wheelchair, often gasping for breath, and slept on a rocking bed to breathe. He needed 24-hour care and eventually died of disease complications.

The National Consumers League is a strong proponent of vaccines, truly medicine's most precious gift to the human race. In this vein, we are also here to express concerns about ACIP's recommendation for coverage of the pneumococcal vaccine for adults ages 65+. NCL works to educate consumers about the importance of vaccines and dispel pernicious 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.

According to the CDC, 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, over [66](#) percent of the total United States population has been vaccinated against pneumococcal disease (as of 2016).

While impressive, 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, we believe Medicare coverage must be maintained, which is dependent on maintaining the current recommendation from ACIP.

According to the National Center for Health Statistics, influenza and pneumonia are the [8<sup>th</sup> leading cause of death](#) in the United States. We fear that without ACIP's recommendations, the current pneumococcal vaccine recommendations – which also protect patients against comorbidities caused by pneumonia, meningitis, and bacteremia – will further burden healthcare resources.

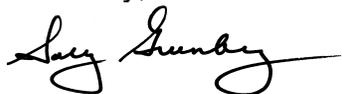
Finally, changing ACIP's recommendation for the pneumococcal vaccine would negatively impact communities of color, whose vaccination rates fall below the national average but have risen due to Medicare coverage. In addition, ACIP's recommendation for the current pneumococcal vaccine schedule has the ancillary benefit of protecting children who are too young to receive vaccines, and immunocompromised individuals who are unable to get vaccinated.

We should strive to keep adult immunizations simple and accessible to ensure increased protection and encourage greater vaccine uptake.

In closing, 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, and those they come into contact with. 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,



Sally Greenberg, Executive Director