February 19, 2019

Advisory Committee on Immunization Practices
Centers for Disease Control and Prevention

Dear Advisory Committee on Immunization Practices members,

We, the undersigned organizations, write to urge you not to take back the recommendation for coverage of the pneumococcal vaccine. As you know, adults 65 years of age and older are ten times more likely to be hospitalized with pneumococcal pneumonia than adults younger than 50 years of age. In fact, even healthy older adults cannot respond as effectively to infection as middle or young adults.

Every year in the United States, approximately 1 million people get pneumonia, and 5-7% of those patients die from the disease. From that, roughly 18,000 older adults die from pneumonia annually. When looking at the top 10 leading causes of death in the United States, influenza and pneumonia rank eighth. Vaccines are the best tool at preventing pneumococcal disease. It is currently recommended by the Centers for Disease Control and Prevention (CDC) that all adults age 65+ be vaccinated with two separate vaccines to prevent contracting pneumococcal disease. Changing the current vaccination schedule could result in an increase in disease incidence.

Your 2014 & 2015 pneumococcal vaccine recommendations and the subsequent CMS approval for the coverage of the pneumococcal vaccine have resulted in enhanced vaccination coverage for adults 65 years of age and older, with 60 percent of the total US population having been vaccinated. To reach the Healthy People 2020 target of 90 percent of noninstitutionalized adults aged 65 years and older who are vaccinated against pneumococcal disease, Medicare coverage for this vaccine must be maintained. Ending Medicare coverage 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. As organizations dedicated to promoting the health for older adults, we strongly urge you not to reverse your previous recommendation for the coverage of the pneumococcal pneumonia vaccine.

Vaccine preventable adult illnesses cost society billions of dollars each year in treatment, hospitalizations and lost productivity. A recent study from the University of North Carolina found that unvaccinated adults cost the U.S. economy $7.1 billion annually. Of that $7.1 billion, $1.86 billion in healthcare related costs are attributed to unvaccinated adults contracting pneumococcal disease. According to the Office of Minority Health only approximately 50 percent of non-Hispanic Blacks had ever received the pneumococcal
vaccine, compared to nearly 65 percent of non-Hispanic whites. In 2015, Hispanic adults aged 65 and older were 40 percent less likely to have ever received the pneumonia vaccine when compared to non-Hispanic whites.

In October 2018, some ACIP members expressed that there may not be adequate data to support continued coverage. However, what does remain clear is that pneumococcal vaccination is safe and has been effective. With the number of Americans ages 65 and older projected to grow from 46 million to over 98 million by 2060, it is imperative to promote and protect proactive health measures such as vaccination to keep our aging population healthy.

We urge you not to reverse your recommendation for CMS coverage of the pneumococcal vaccine.

Sincerely,

National Hispanic Council on Aging (NHCOA)
Aging Life Care Association
Diverse Elders Coalition (DEC)
SAGE
Caregiver Action Network
Caregiver Voices United
RetireSafe
The National Caucus and Center on Black Aging Inc. (NCBA)
International Association for Indigenous Aging
The Society for Post-Acute and Long-Term Care Medicine (AMDA)
Justice in Aging
Medicare Rights Center
National Association of Nursing and Aging Services Programs (NANASP)
Vida Senior Centers
National Consumers League