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July 19, 2022

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Chair, Advisory Committee on Immunization Practices
Associate Chief Medical Officer for Practice Innovation
Lucile Packard Children's Hospital
Professor of Pediatrics, Stanford University School of Medicine

Melinda Wharton, MD, MPH
Executive Secretary, Advisory Committee on Immunization Practices
National Center for Immunization and Respiratory Diseases
Centers for Disease Control and Prevention

Re: Docket No. CDC-2022-0085 for Request for Comments for "Advisory Committee on Immunization Practices (ACIP) July 19, 2022"

Dear Dr. Lee and Dr. Wharton,

Thank you for the opportunity to submit a public comment to the Advisory Committee on Immunization Practices (ACIP) July 19, 2022, meeting. Our organization, the [Alliance for Aging Research](http://www.agingresearch.org) (the "Alliance"), is the leading non-profit organization dedicated to accelerating the pace of scientific discoveries and their application to improve the experience of aging and health. The Alliance believes that advances in research help people live longer, happier, more productive lives and reduce health care costs over the long term. For the past six years, the Alliance has led the [Our Best Shot](#) educational campaign, which encourages vaccine confidence, aims to increase vaccination rates, and arms older adults with reliable information about vaccines.

We are encouraged that manufacturers continue to pursue the development of vaccines, boosters, and therapeutics for the prevention and treatment of COVID-19. Patients and clinicians need access to a broad spectrum of prevention and treatment tools as the virus continues to evolve and become endemic. As such, it is essential that patients are able to access vaccines that are authorized or approved by the Food and Drug Administration ("FDA").

Older adults have generally experienced higher COVID-19 vaccination rates than younger population groups. This success in vaccinating older adults has been vital, given older adults' increased susceptibility to

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severe symptoms and mortality as a result of a COVID-19 infection. As of July 12th, 94 percent of adults ages 65-74 and 89 percent of adults ages 75 and older have completed a COVID-19 vaccine dosage series.¹² As of early July, 87.5 percent of residents in nursing homes have completed their COVID-19 vaccine series, which is especially critical since they are at especially high risk of developing severe or fatal complications.³⁴ While these numbers are high compared to the rest of the adult U.S. population, they are insufficient for fully protecting residents and staff at these facilities.

Vaccine hesitancy continues to play a role across all age groups in the U.S. and is a constantly evolving problem. While older adults have less hesitancy on average, there are still millions of older adults aged 65 and older that have not yet received a vaccine. We are excited by the continued availability of COVID-19 vaccines and treatments. The development of additional options perceived as having been developed in a more “traditional” fashion, such as the Novavax vaccine, may be more appealing to individuals that remain COVID-19 vaccine hesitant. Though many in the unvaccinated group may remain unwilling to receive a vaccination, the ACIPs recommendation of new COVID-19 vaccines as they are approved or authorized will provide access to additional options that may hold appeal to this population. As such, the Alliance was pleased that ACIP unanimously voted in favor of recommending the Novavax two-dose COVID-19 vaccine as a primary series for adults during today’s meeting.

For Additional Information

Thank you again for the opportunity to provide written comments for ACIP’s July 19 meeting. If you have any questions regarding our comments, please contact me at alasser@agingresearch.org.

Sincerely,



Michael Ward
Vice President of Public Policy and Government Relations



Adina Lasser
Manager of Public Policy

¹ [COVID-19 Vaccination and Case Trends by Age Group, United States | Data | Centers for Disease Control and Prevention \(cdc.gov\)](#)

² Centers for Disease Control and Prevention. “COVID-19 Risks and Vaccine Information for Older Adults.” Last updated 2022. <https://www.cdc.gov/aging/covid19/covid19-older-adults.html#:~:text=Older%20adults%20are%20more%20likely,60s%2C%2070s%2C%20and%2080s>.

³ Centers for Disease Control and Prevention. “COVID-19 Risks and Vaccine Information for Older Adults.” Last updated 2022. <https://www.cdc.gov/aging/covid19/covid19-older-adults.html#:~:text=Older%20adults%20are%20more%20likely,60s%2C%2070s%2C%20and%2080s>.

⁴ Centers for Medicare and Medicaid Services. “COVID-19 Nursing Home Data.” 3 Jul 2022. <https://data.cms.gov/covid-19/covid-19-nursing-home-data>