



February 17, 2023

Dockets Management Staff (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852.

Re: Docket Number FDA-2023-N-0246, “Vaccines and Related Biological Products Advisory Committee (VRBPAC); Notice of Meeting; Establishment of a Public Docket; Request for Comments”

To Whom It May Concern:

On behalf of the Asthma and Allergy Foundation of America (AAFA), I am pleased to provide comments to the Vaccines and Related Biological Products Advisory Committee with regard to its consideration of Respiratory Syncytial Virus (RSV) vaccines for adults aged 60 years and older. AAFA is the leading patient organization advocating for people with asthma and allergies, and the oldest asthma and allergy patient group in the world.

RSV can be particularly dangerous for older adults with asthma. RSV can trigger asthma episodes or attacks. Being over 65 and having asthma are both factors for greater risk of RSV-related hospitalization or death.¹ Because of the severe impact of RSV on older adults, particularly older adults with asthma or other chronic lung disease, we are heartened by the potential availability of these vaccines.

In the U.S., older adults with asthma face myriad challenges. Approximately 7.8% of people aged 65 and older have asthma, a rate roughly the same as that experienced across the whole population.² However, for older adults, asthma can

¹ Centers for Disease Control and Prevention, “Older Adults are at High Risk for Severe RSV Infection” (2022). Available at <https://www.cdc.gov/rsv/factsheet-older-adults.pdf>

² Centers for Disease Control and Prevention. Most Recent National Asthma Data (2020). U.S. Department of Health and Human Services.



have more severe consequences, triggering more symptoms and higher death rates.³ Physical changes from aging, reduced motor and other skills, lower income, and the demands of other comorbid conditions can all exacerbate older adults' asthma and create barriers to care.⁴

Overall, older adults are more likely to be underdiagnosed and undertreated for asthma than younger adults.⁵ Reflecting overall disparities in asthma in the U.S., asthma impacts older adults of certain racial and ethnic groups more severely; for example, older adults with asthma who are Black, Hispanic, and/or low income are at a heightened risk of frequent hospitalization.⁶

Because of these factors, we ask the Advisory Committee to take into account not only the overall potential impact of RSV vaccines for older adults, but in particular the potential importance of such vaccines for older adults with asthma, including those subpopulations most burdened by the disease. A vaccine for RSV could reduce asthma exacerbations, improving quality of life for older adults living with asthma; and reduce mortality, particularly among older adults with asthma.

Our patient community drives our work. AAFA strongly supports utilization of preventive interventions that can improve the health of individuals and communities living with asthma. This includes education and outreach to encourage utilization of vaccines for respiratory illnesses that can exacerbate asthma, such as flu, pneumococcal disease, and whooping cough,⁷ based on

https://www.cdc.gov/asthma/most_recent_national_asthma_data.htm. CDC asthma surveillance data does not separate adults age 60–64 from the larger adult population of 35–64.

³ AAFA, “Asthma in Older Adults” (reviewed 2022). Available at <https://aafa.org/asthma/living-with-asthma/asthma-in-older-adults/>

⁴ *Id.*

⁵ Dunn, R. M., Busse, P. J., & Wechsler, M. E. (2018). Asthma in the elderly and late-onset adult asthma. *Allergy*, 73(2), 284–294. <https://doi.org/10.1111/all.13258>

⁶ *Id.*

⁷ See, e.g., AAFA, “Vaccine Recommendations” (2017). Available at [Asthma Increases Risk of Certain Preventable Diseases | AAFA.org](#)



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Foundation of America

CDC recommendations.⁸ If RSV vaccines for older adults become available, AAFA stands ready to help educate the asthma community about their importance, and to work to promote access and uptake.

Thank you very much for your important work reviewing these vaccines. If you would like any additional information regarding asthma, older adults, and RSV, please do not hesitate to contact Jenna Riemenschneider at jennar@aafa.org.

Sincerely,

Kenneth Mendez
President and Chief Executive Officer
Asthma and Allergy Foundation of America

⁸ Centers for Disease Control and Prevention, “The Adult Vaccine Assessment Tool” (2023). Available at <https://www2.cdc.gov/nip/adultimmsched/>