Immunization: It is now time to make it unclear -Reconciling differences between Public Health recommendations and FDA Product Labeling for Vaccines

(Potayto, Potahto? Tomayto, Tomahto?)



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Disclosures

- Dr. Aeschlimann has the following relevant financial relationship to disclose:
 - Consultant F2G, Inc. (Olorofim; an investigational antifungal agent)
- This activity may contain discussion of unlabeled/unapproved use of drugs.
 - The content and views presented in this educational program are those of the faculty and do not necessarily represent those of the University of Connecticut School of Pharmacy.
 - Please refer to the official prescribing information for each product for discussion of approved indications, contraindications, and warnings

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Disclosures. Part 2

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Lagrania a Objectives

- $\bullet \hspace{0.4cm}$ At the conclusion of this CPE activity, participants should be able to:
 - Compare and contrast the roles & activities of the Center for Biologics Evaluations and Research (CBER), US Food & Drug Administration (FDA), Centers for Disease Control & Prevention (CDC), and the Advisory Committee on Immunization Practices (ACIP) during the development and clinical use of vaccines in the United States.
 - Describe one specific example where the routine clinical use of a vaccine may differ from FDA-approved product prescribing information due to the following: (a) costs, (b) disease epidemiology, (c) public acceptance, (d) vaccine supplies.

Pre-Test Time!

- The COVID-19 pandemic and the recent rise of "antivax" cranks, charlatans, and grifters on various social media platforms has increased the public's attention to / scrutiny of government-associated entities involved in vaccine development and use...
- For vaccines, which <u>ONE</u> of the following is <u>NOT</u> a defined role/responsibility o the Food & Drug Administration (FDA)?
 - a) Verifying appropriate vaccine manufacturing processes
 - b) Approving advertising for vaccine products
 - c) Managing the Vaccine Adverse Event Reporting System (VAERS)
 - d) Determining the strategy for public use of vaccines in the U.S.

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Vaccine development, licensing, approval, and use in the United States

JCONN SCHOOL OF PHARMACY

Key Agencies / Organizations for Vaccines

- US Food & Drug Administration (FDA)
- Center for Biologics Evaluations and Research (CBER)
- Vaccines and Related Biological Products Advisory Committee (VRBPAC)
- Centers for Disease Control and Prevention (CDC)
- Advisory Committee on Immunization Practices (ACIP)

https://doi.org/10.1542%2Fpeds.2018-0780

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Roles & Responsibilities of the CBER

Regulatory oversight of biological products development & licensing

Public Health Service Act and the Federal Food, Drug and Cosmetic Act

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The mission of the Center for Biologics Evaluation and Research (CBER) is to ensure the safety, purity, potency, and effectiveness of biological products including vaccines, allergenics, blood and blood products, and cells, tissues, and gene therapies for the prevention, diagnosis, and treatment of human diseases, conditions, or injury. Through our mission, we also seek to protect the public against the threats of emerging infectious diseases and bioterrorism.

https://www.fda.gov/about-fda/fda-organization/center-biologics-evaluation-and-research-cber

Vaccines and Related Biological Products Advisory Committee (VRBPAC)

• 15-member Federal advisory committee

The Committee shall consist of a core of 15 voting members including the Chair. Members and the Chair are selected by the Commissioner or designee from among authorities knowledgeable in the fields of immunology, molecular biology, rDNA, virology; bacteriology, epidemiology or biostatistics, vaccine policy, vaccine safety science, federal immunization activities, vaccine development including translational and clinical evaluation programs, allergy, preventive medicine, infectious diseases, pediatrics, microbiology, and biochemistry.

https://www.fda.gov/about-fda/fda-organization/center-biologics-evaluation-and-research-cber

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Vaccines and Related Biological Products Advisory Committee (VRBPAC)

• 15-member Federal advisory committee

What is an advisory committee?

Advisory committees give FDA Critical Advice and the Public a Voice," for more

https://www.fda.gov/about-fda/fda-organization/center-biologics-evaluation-and-research-cbe

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FDA/CBER Vaccine Licensing Requirement

- Demonstration of Safety (Risks) & Benefits:
 - What population(s) will be receiving the vaccine?
 - What are the characteristics of the disease(s) the vaccine targets?
 - Infectivity
 - · Public health effects
 - · Individual morbidity/mortality

https://doi.org/10.1542%2Fpeds.2018-0780 https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?fr=314.126

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FDA/CBER Vaccine Licensing Requirements

- · Vaccine Effectiveness:
 - "Adequate and well-controlled" Randomized controlled trials (RCTs)
 - Endpoints: It depends.
 - Prevention of transmission, reduction of disease severity
 - Immunologic Response [with established correlation to clinical outcomes]
 - Influenza, COVID-19

https://doi.org/10.1542%2Fpeds.2018-0780 https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?fr=314.126

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FDA-Required Vaccine Prescribing Information ("Product Insert")

- LOTS of important information!!!
 - Indications & Usage, Dosage & Administration
 - Contraindications, Warnings, Precautions, Adverse Effects, Interactions
 - · Special populations
 - Clinical trial data summaries
 - Storage, handling, preparation
 - Patient counseling information

https://doi.org/10.1542%2Fpeds.2018-0780

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FDA-Required Vaccine Prescribing Information ("Product Insert")

- What <u>DOESN'T</u> get included in the Product Insert???
 - Advice for use in many important detailed population subgroups:
 - Age ranges (<u>></u>60y vs. 60-69y/70-79y/80+ y)
 - Chronic illnesses
 - Immunocompromised status
 - Considerations for use in:
 - · Outbreak/pandemic situations
 - Other timely public health scenarios
 - Vaccine product shortage situations

https://doi.org/10.1542%2Fpeds.2018-0780 https://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfcfr/CFRSearch.cfm?fr=314.126 Who "weighs in" and provides guidance on these "practical use" items related to vaccines?



- ACIP: Federal Advisory Committee to the CDC
 - 15 voting-member experts, ~30 non-voting representatives
 - "...people who are directly employed or have an immediate family member directly employed by a vaccine manufacturer, hold a patent on a vaccine or related product, or serve on a Board of Directors of a vaccine manufacturer are excluded from ACIP membership."

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- ACIP:
 - Regularly-scheduled meetings (≥3/year) for vaccine recommendations
 - · Work groups:
 - · New scientific data on FDA-approved vaccines
 - Pre-FDA approval analyses of scientific data for new vaccines

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- ACIP: Federal Advisory Committee to the CDC
 - "...ACIP shall provide advice and guidance to the Director of the CDC regarding use of vaccines and related agents for effective control of vaccine-preventable diseases in the civilian population of the United States."
 - "For each vaccine, the Committee advises on population groups and/or circumstances in which a vaccine or related agent is recommended."
 - "...provides recommendations on contraindications and precautions for use of the vaccine and related agents and provides information on recognized
 - "...may provide recommendations that address [...] special situations or populations that may warrant modification of the routine recommendations."

https://www.cdc.gov/vaccines/acip/committee/charter.html

• General Process for Vaccine Recommendations:

ACIP recommendations presented to CDC director

CDC Director Approval of Recs

Recs published in CDC's Morbidity and Mortality Weekly Report (MMWR)

Represent the "official" CDC recommendations for immunizations in the United States

 $\underline{\text{https://www.cdc.gov/vaccines/acip/committee/role-vaccine-recommendations.html}}$

21 22

- Which of the following items would you expect to always/very-commonly see in the FDA-Approved product labeling for a vaccine product?
 - a) Instructions for preparation of the product for administration
 - b) Comparative effectiveness data for people taking chronic steroid therapy
 - Recommendations for use of lower doses in case of product shortages
 - d) Data on serum antibody titers following receipt of the approved vaccine

Examples of ACIP / CDC Modifications & Improvements of Vaccine Use...



ACIP Guidance on Additional Hepatitis B Vaccine doses in High-Risk Health-Care Personnel



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https://www.cdc.gov/mmwr/pdf/rr/rr6007.pdf

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ACIP Guidance on Additional HBV Vaccine doses in High-Risk Health-Care Personnel

HIGHLIGHTS OF PRESCRIBING INFORMATION
These highlights do not include all the information needed to use HEPLISAY-B* safety and effectively. See full prescribing information for HEPLISAY-B.

HEPLISAY-B [Hepatitis B Vaccine (Recombinant), Adjuvanted] Solution for Intramuscular Injection
Initial US Approval: 2017

FULL PRESCRIBING INFORMATION

1 INDICATIONS AND USAGE
HEPLISAY-B is included as prevention of infection caused by all known nobpyes of hepatitis B virus. HEPLISAY-B is approved from in adults By your of age and older.

2 DOSAGE AND ADMINISTRATION
For intramocular administration.
2.1 Desc and Registers
Administer two doses (0.5 mL casch) of HEPLISAY-B ose month apart.

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ACIP Guidance on Additional HBV Vaccine doses in Health-Care Personnel Centers for Disease Control and Prevention Morbidity and Mortality Weekly Report November 25, 2011 Immunization of Health-Care Personnel Recommendations of the Advisory Committee on Immunization Practices (ACIP) https://www.cdc.gov/mmwr/pdf/rr/rr6007.pdf

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ACIP Guidance on 3rd dose of Mumps Virus-Containing Vaccine during outbreaks



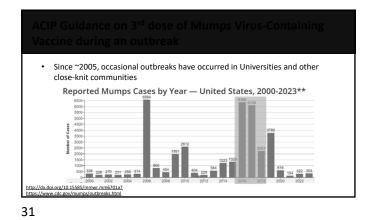
Current recommended standard: 2-dose MMR or MMRV vaccination schedule
Procuadi
Massles, Mumps, Rubella and Varicella Virus Vaccine Live
Suspension for Intramuscular or subcutaneous injection
Initial U.S. Approval: 2005

INDICATIONS AND USAGE
ProCuad is a vaccine indicated for active immunization for the prevention of measles, mumps, rubella, and varicella in children 12 months through 12 years of age.

2 DOSAGE AND ADMINISTRATION
INTRAMUSCULAR OR SUBCUTANEOUS ADMINISTRATION ONLY
2.1 Dose and Schedule
A single dose of ProCuad is approximately 0.5-mL.
The first dose is administered at 4 to 6 years of age.
At least 1 month should despee between a dose of a measles-containing vaccine and a dose of ProCuad.
At least 1 month should elapse between a dose of varicella-containing vaccine and ProCuad.

https://www.dd.agou/media/147563/fowenload.

29 30



ACIP Guidance on 3rd dose of Mumps Virus-Containing Vaccine during an outbreak

- 2017: ACIP Mumps Work Group:
 - · Reviewed available scientific data
 - Developed recommendations for 3rd dose "...among persons who are at increased risk for acquiring mumps because of an outbreak."
 - Some evidence for significantly lower mumps attack rates in persons who received a 3rd dose in prior outbreaks...
 - Mumps-specific antibody titers significantly increased within 1 month of 3rd dose
 - No serious adverse events, high safety of product
 - CDC-conducted surveys of stakeholders for values, acceptability, implementation considerations:
 - Survey response rates from students/parents were "very low" (<0.5%) !!!

http://dx.doi.org/10.15585/mmwr.mm6701a7 https://www.cdc.gov/mumps/outbreaks.html

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ACIP Guidance on 3rd dose of Mumps Virus-Containing Vaccine during an outbreak

Recommendation

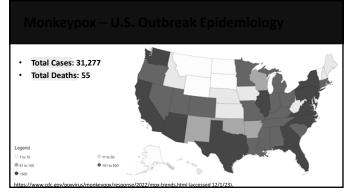
Persons previously vaccinated with 2 doses of a mumps virus-containing vaccine who are identified by public health authorities as being part of a group or population at increased risk for acquiring mumps because of an outbreak should receive a third dose of a mumps virus-containing vaccine to improve protection against mumps disease and related complications.

http://dx.doi.org/10.15585/mmwr.mm6701a7

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ACIP-FDA-NIH-etc Guidance for vaccination during mPox outbreak of 2022 (with limited vaccine supplies)

JCONN SCHOOL OF PHARMACY



Daily Monkeypox Cases and 7 Day Daily Average

Daily Monkeypox Gases and

35

Total Vaccine Dosage Administrations in the U.S.

Total Vaccine Doses Administered

1,280,114

Doses Administered in the 57 U.S. Jurisdictions Reporting Data as of November 28 2023 .

Total JYNNEOS Vaccine Second Doses and First Doses Reported to CDO

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Knowledge Check!

- Which of the following statements is FALSE regarding ACIP recommendations for HBV vaccines, Mumps vaccine products, and/or mPox vaccines?
 - a) The JYNNEOS® vaccine was recommended by the CDC for intradermal administration to persons at high risk of mpox in June 2022
 - HCPs with low anti-HBs concentrations following a standard 2- or 3-dose HBV vaccine series should be given one additional "booster" dose
 - A "booster" dose of Mumps-containing vaccine products should be given to all students before they head to college

ACIP Guidance for "Shared Clinical Decision-making" [SCDM] for Vaccines



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ACIP "Shared Clinical Decision-making" Recommendations

 "...shared clinical decision-making vaccinations are not recommended for everyone in a particular age group or everyone in an identifiable risk group...[they] are individually based and informed by a decision process between the health care provider and the patient or parent/guardian."

https://www.cdc.gov/vaccines/acip/acip-scdm-faqs.html

ACIP SCDM Recommendations

- All other ACIP vaccination recs: **DEFAULT = VACCINATE**
- SCDM: Consider to vaccinate/not vaccinate based on:
 - best available evidence of who may benefit
 - individual's characteristics, values, and preferences
 - health care provider's clinical discretion
 - characteristics of the vaccine(s) being considered

https://www.cdc.gov/vaccines/acip/acip-scdm-faqs.html

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Who is considered a health care provider with regard to shared clinical decision-making recommendations?

In this context, CDC defines a health care provider as anyone who provides or administers vaccines: primary care physicians, specialists, physician assistants, nurse practitioners, registered nurses, and pharmacists.

Which patients should providers discuss shared clinical decision-making recommendations with?

It's up to the provider. Some health care providers may choose to discuss immunizations recommended for shared clinical decision-making with all or most of their patients who could receive it, while some providers may be more selective when discussing these immunizations with their patients. Health care providers should also be receptive to patient-initiated conversations about these immunizations.

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- Respiratory syncytial virus (RSV) vaccination for adults aged 60 years and older
- Meningococcal B (MenB) vaccination for adolescents and young adults aged 16–23 years
- Hepatitis B (HepB) vaccination for adults aged 60 years and older with diabetes mellitus
- Human papillomavirus (HPV) vaccination for adults aged 27–45 years
- Pneumococcal conjugate vaccination (PCV20) for adults aged 65 years and older who have completed the recommended vaccine series with both PCV13 (at any age) and PPSV23 (which was administered at age ≥65 years)

https://www.cdc.gov/vaccines/acip/acip-scdm-faqs.html

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HIGHLIGHTS OF PRESCRIBING INFORMATION These highlights do not include all the information needed to use GARDASIL 9 safely and effectively. See full prescribing information for GARDASIL 9.

(Human Papillomavirus 9-valent Vaccine, Recombinant) Suspension for intramuscular injection Initial U.S. Approval: 2014

https://www.cdc.gov/vaccines/acip/acip-scdm-faqs.html https://www.fda.gov/media/90064/download

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INDICATIONS AND USAGE

1.1 Girls and Women

CANDASIL*9 is a vaccine indicated in girls and women 9 through 45 years of age for the prevention of the following diseases:

— Cervical, vulvar, vaginal, anal, oropharyngeal and other head and neck cancers caused by Human Papillomavirus (HPV) types 16, 16, 31, 33, 45, 52, and 58

— The control of the con

- Cervical intraepithelial neoplasia (CIN) grade 2/3 and cervical adenocarcinoma in situ (AIS) Cervical intraepithelial neoplasia (CIN) grade 1
- Vulvar intraepitnelial neoplasia (ViN) grade 1 Vulvar intraepithelial neoplasia (ViN) grade 2 and grade 3 Vaginal intraepithelial neoplasia (ValN) grade 2 and grade 3 Anal intraepithelial neoplasia (AlN) grades 1, 2, and 3

1.2 Boys and Men

GARDASIL 9 is indicated in boys and men 9 through 45 years of age for the prevention of the following

Anal, oropharyngeal and other head and neck cancers caused by HPV types 16, 18, 31, 33, 45, 52, and 58

52, and 58

• Genital warts (condy/oma acuminata) caused by HPV types 6 and 11
And the following precancerous or dysplastic lesions caused by HPV types 6, 11, 16, 18, 31, 33, 45, 52, and 58:

Anal intraepithelial neoplasia (AIN) grades 1, 2, and 3

The oropharyngeal and head and neck cancer indication is approved under accelerated approval based https://www.cdc_battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Battops://www.tda_Batto

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- June 2019:
 - shared clinical decision-making for HPV vaccination of adults aged 27–45 years Shared Clinical Decision-Making

HPV Vaccination for Adults Aged 27-45 Years

Human catelliomavirus 2 or 3 doses depending on 04PV) (i) age at initial vaccination or 27 through 45 years	Vaccine	19-26 years	27-49 years	50-64 years	≥65 years
CONDITION			27 through 45 years		

 $\underline{https://www.cdc.gov/vaccines/hcp/admin/downloads/isd-job-aid-scdm-hpv-shared-clinical-decision-making-hpv.pdf}$

HPV vaccination does not need to be discussed with most adults in this age group. you do decide to discuss HPV vaccination with an adult patient

Remember:

Most HPV infections clear on their own within a year or two, but persistent infections can lead to development of precancers or cancers, usually after several decades.

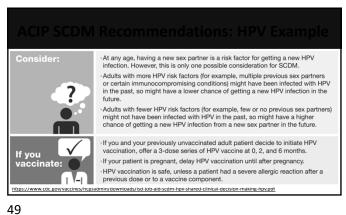
HPV vaccination is not routinely recommended for adults 27-45 years of age.

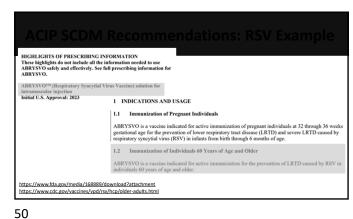
HPV vaccine effectiveness is highest in people who have never had sex.

HPV vaccination prevents new HPV infection, it does not treat existing HPV infection or disease.

Most adults who have had sex have been exposed to HPV before.

·HPV vaccine effectiveness might be low among people with more risk factors for HPV, such as having had sex with more than one person or having certain immunocompromising conditions.



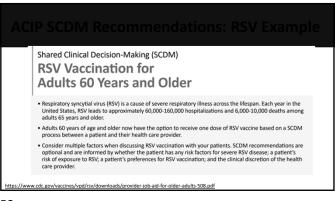


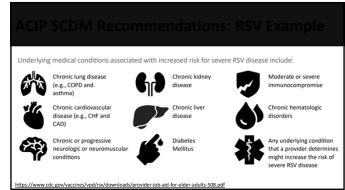


19-26 years 27-49 years 50-64 years espiratory Syncytial Virus Decision to vaccinate may be informed by: · The patient's health status · Their risk of severe RSV disease · The health care provider's clinical judgment • The patient's preferences · The safety profile of the RSV vaccine products https://www.cdc.gov/vaccines/acip/acip-scdm-faqs.html

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ACIP SCDM Recommendations: RSV Example

Other factors associated with increased risk for severe RSV disease include:



Frailty or advanced age, as determined by the healthcare provider





Other points to consider:

- Serious neurologic conditions, including Guillain-Barré syndrome (GBS), have been reported after RSV vaccination in clinical trials. However, it is unclear whether the vaccine caused these events.
- Persons with history of severe allergic reaction (e.g., anaphylaxis) to any component of RSV vaccine should not receive the vaccine.

https://www.cdc.gov/vaccines/vpd/rsv/downloads/provider-job-aid-for-older-adults-508.pdf

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Let's "SCDM" some example patient cases together...

- The following people come into your pharmacy and inquire about getting the new "RSV vaccine that they saw advertised on TV the other night during an episode of Jeopardy..."
- What are some SCDM thoughts / opinions / questions / advice you have for:
 - A 70-year-old female (she/her) in very good health (other than osteopenia) who
 volunteers once a week at a local nursing home
 - 2. A 61 year old male (he/him) with extreme obesity, COPD, diabetes, hypertension, hyperlipidemia, and atrial fibrillation
 - A 50-year female (she/her) who has had a kidney transplant and who is on two potent immunosuppressive medications

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ACIP SCDM Recommendations: Show me the Money???

Under the Affordable Care Act and its implementing regulations, ACIP recommendations that have been adopted by CDC "with respect to the individual involved" and are "listed on the Immunization Schedules of the Centers for Disease Control and Prevention" generally are required to be covered by group health plans and health insurance issuers offering group or individual health insurance coverage without imposing any cost-sharing requirements (such as a copayment, coinsurance, or deductible).[1] This coverage requirement includes shared clinical decision-making recommendations when they have been adopted by CDC and are listed on the immunization schedules.

https://www.cdc.gov/vaccines/acip/acip-scdm-faqs.html

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Conclusions & Final Thoughts...

- The FDA & CDC (and associated agencies/committees) play complementary roles in vaccine approval and optimal use in the United States
- The use of many vaccines can be complex!
 - FDA provides foundational guidance
 - CDC/ACIP provides timely granular/nuanced advice
- If you can't find info for your specific patient in the product insert, chances are the CDC/ACIP can help!

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Thank you!!!

• Questions?

SESSION CODE