



# NATIONAL GRANGE

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*American Values. Hometown Roots.*

October 15, 2020

Vaccines and Related Biological Products Advisory Committee  
Food and Drug Administration  
U.S. Department of Health and Human Services  
10903 New Hampshire Avenue  
Silver Spring, MD 20993

RE: Docket Number FDA-2020-N-1898  
Vaccine Delivery Options

Dear Members of the Committee:

The National Grange is the oldest general farm and rural life organization in the United States. Now in its 153rd year, the Grange has worked at the local, state, and national level to address the needs and concerns of its members, their friends and neighbors, as well as all rural Americans. Since the onset of the COVID-19 virus began in the United States, this pandemic has impacted communities of every size and description across the country. Needless to say, we have particular concerns regarding its effect on our nation's rural populations where access issues, health vulnerabilities, unmet needs, and increased distances to care already affect almost 20% of Americans.

Accordingly, the National Grange urges the Food and Drug Administration (FDA) to consider any and all COVID-19 vaccine delivery options that prioritize the health and safety of those from rural walks of life. For these Americans with limited access and formidable barriers to care, we believe that innovative options such as an oral vaccine in pill form should be pursued alongside the traditional injection format. Such options not only provide every person with new choices but also serve to overcome many of the obstacles that rural Americans face when seeking care.

A national study reported in the July 2019 issue of the New England Journal of Medicine found that there are only 12 doctors per 10,000 people in rural America versus more than twice that number (29.6 per 10,000) in urban areas. Moreover, the study forecast a 23% decline in the number of rural physicians over the next decade as current doctors retire. Those grim statistics, coupled with the fact that over 100 rural hospitals have closed in the last decade, further complicate the health care access situation for our Grange members and their communities throughout the country.

In short, medical facilities, diagnostic equipment, storage space, safe maintenance of supplies and medicines, costs, as well as numbers and types of providers are all concerns to rural Americans. Alternative ideas, innovation, and choices are essential.

An effective COVID vaccine that might alleviate the necessity of office visits for each person, one that could be delivered through the mail, for example, would be a remarkable game changer. Moreover, it would give each individual and their provider the freedom to choose for themselves among a variety of options, allowing those in at-risk groups to receive the protection they need.

This would serve not only as a safeguard to the increased exposure and spread of the virus, but also could protect countless Americans who are unable or unwilling to travel long distances to become vaccinated against the danger of COVID-19. Simply relying on one solution to this pandemic could place already vulnerable rural populations at a significant disadvantage when compared to other communities.

The National Grange supports our government's efforts to end this pandemic as soon as possible, and we believe that a COVID-19 oral vaccine option would significantly aid this effort. It is the responsibility of the federal government, as well as the FDA, to protect all Americans equally, no matter where they may call home.

Respectfully,

A handwritten signature in black ink that reads "Betsy Huber". The signature is written in a cursive, flowing style.

Betsy Huber  
President