



Leading Change. Improving Care for Older Adults.

THE AMERICAN GERIATRICS SOCIETY
40 FULTON STREET, SUITE 809
NEW YORK, NEW YORK 10038
212.308.1414 TEL
www.americangeriatrics.org

January 31, 2023

USPSTF Coordinator
c/o USPSTF
5600 Fishers Lane
Mail Stop 06E53A
Rockville, MD 20857

Subject: AGS Comments on USPSTF Vitamin D and Calcium Supplementation to Prevent Fractures and Falls Research Plan

To Whom it May Concern:

The American Geriatrics Society (AGS) appreciates the opportunity to review and comment on the United States Preventive Services Taskforce's (USPSTF's) draft research plan on Vitamin D and Calcium Supplementation to Prevent Fractures and Falls. Founded in 1942, the AGS is a nationwide, not-for-profit society of geriatrics healthcare professionals dedicated to improving the health, independence, and quality of life of older people.

Our nearly 6,000 members include geriatricians, geriatrics nurses, social workers, family practitioners, internists, pharmacists, physician assistants who are pioneers in advanced-illness care for older adults, with a focus on championing interprofessional teams, eliciting personal care goals, and treating older people as whole persons. The AGS believes in a just society, one where we all are supported by and able to contribute to communities where ageism, ableism, classism, homophobia, racism, sexism, xenophobia, and other forms of bias and discrimination no longer impact healthcare access, quality, and outcomes for older adults and their caregivers. The AGS advocates for policies and programs that support the health, independence, and quality of life of all of us as we age.

Considering that the population of people aged 65 and older is projected to increase dramatically in the coming years, the AGS believes that both the quality and efficiency of care delivered to older Americans with multiple chronic and complex conditions must be improved. Older people with chronic illnesses and complex conditions often do not receive optimal care which reduces overall well-being and contributes to disproportionately high healthcare costs for these individuals. We support resources and guidelines that support delivering high-quality, effective, efficient, and coordinated care for older adults and all Americans as we age.

Proposed Research Plan – AGS Recommendations

In general, we believe that the plan proposed is reasonable for assessing the impact of supplements in relatively healthy community dwelling persons with no known disorders of bone metabolism or nutritional deficiencies. However, there are already multiple recent systematic reviews focused on this

population, and so we would suggest a refinement to focus on those older adults more likely to have Vitamin D deficiency. Characteristics of this group include frailty, prior falls, advanced age, and residing in a nursing home.

There remains clinical uncertainty as to those groups of older adults more likely to have Vitamin D deficiency (and whether supplements have benefit for these groups which the AGS believes could only be answered with a patient-level meta-analysis).

AGS recommends that the USPSTF pre-specify a review of those studies that include participants with one or more of the following characteristics:

1. Advanced age
2. Evidence of frailty,
3. Pre-existing mobility problems (e.g., falls)
4. Long term care residents broadly to include nursing home and residential homes like assisted living (these may have different names outside the U.S).

We appreciate that the plan includes an emphasis on the diversity within study populations when conducting the meta-analysis. We recommend that USPSTF include a discussion specific to findings on the diversity of the study populations that is inclusive of age diversity.

We also recommend that USPSTF pre-specify that the research will consider fall outcomes of: 1) first fall; and 2) fall rate that includes multiple falls in the same person.

Thank you for taking the time to review our feedback and recommendations. For additional information or if you have any questions, please do not hesitate to contact, Mary Jordan Samuel at mjsamuel@americangeriatrics.org.

Sincerely,



Michael Harper, MD
President



Nancy E. Lundebjerg, MPA
Chief Executive Officer