



May 22, 2020

Azita G. Hamedani, MD, MPH, MBA
Chair, State Disaster Medical Advisory Committee
UW Hospitals and Clinics
600 Highland Avenue
Madison, WI 53792

Submitted electronically at: DHSSDMAC@dhs.wisconsin.gov

Re: Statement on Ventilator Allocation Considerations for Wisconsin Hospitals

Dear Dr. Hamedani,

On behalf of those living with cystic fibrosis in Wisconsin, I write to comment on the proposed Ventilator Allocation Considerations document for Wisconsin hospitals.¹ We recognize the monumentally difficult task public health officials face when creating allocation guidelines that are both equitable and actionable during this crisis, and we appreciate that the state of Wisconsin has taken steps toward creating principles for allocation guidance that will aid health care providers during the current Coronavirus Disease 2019 (COVID-19) pandemic.

Specifically, we are pleased to see that Wisconsin has adapted its approach to ventilator allocation guidance. The previous proposal under consideration in the state, included in the Report and Recommendations of the Ventilator Allocation Advisory Workgroup,² contained language that may have unfairly disadvantaged patients with cystic fibrosis seeking life-sustaining care during the COVID-19 pandemic. We appreciate that the newly released Ventilator Allocation Considerations document contains considerations that will help to protect patients, stating that allocation guidelines should be based on medical considerations only and guidelines need to ensure that allocation decisions “are not systematically biased against specific groups.”

It is critical that guidelines for allocating scarce resources do not unfairly disadvantage patients with cystic fibrosis, as there is no evidence to suggest that people with CF cannot make a full recovery from COVID-19. In fact, an article published in the Journal of Cystic Fibrosis reported that of the 40 reported cases across eight countries, 70 percent of those patients have already recovered.³ Guidelines for allocation scarce resources must ensure that patients with CF are evaluated and triaged for COVID-19 treatment on a case-by case basis consistent with how the general population is assessed.

¹ <https://publicmeetings.wi.gov/view/9f84adc8-7ef2-422c-a81e-1f9c47c3f783/1/disaster>

² <https://www.wpr.org/sites/default/files/fostletter.pdf>

³ https://www.sciencedirect.com/science/article/pii/S1569199320301259?dgcid=rss_sd_all

State allocation guidelines that are transparent and ensure equitable access to scarce resources are an important tool for protecting both care providers and patients in this difficult time, and we appreciate Wisconsin's commitment to ensuring that patients with underlying conditions are not unfairly disadvantaged by allocation schemes. We look forward to working with you as the state continues to revise and develop allocation guidelines.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary Dwight". The signature is fluid and cursive, with a large initial "M" and "D".

Mary Dwight
Chief Policy & Advocacy Officer
Senior Vice President of Policy and Advocacy
Cystic Fibrosis Foundation