



April 1, 2021

Marylou Sudders
Secretary
Executive Office of Health and Human Services
Commonwealth of Massachusetts

Dear Secretary Sudders:

On behalf of the approximately 810 people living with cystic fibrosis in Massachusetts, we write today to urge the state to ensure all people with high-risk medical conditions—including cystic fibrosis—are prioritized for early access to COVID-19 vaccines. The Centers for Disease Control and Prevention (CDC) recently updated its list of medical conditions that can increase the risk of worse outcomes from COVID-19 infection and includes CF.¹ We urge Massachusetts to immediately revise its vaccine prioritization plan to reflect this update; we also call on the state to provide equal access to individuals with one high-risk condition as those with multiple comorbidities included in phase 2, group 2 of the state's vaccine plan.

Background on Cystic Fibrosis and COVID-19

The Cystic Fibrosis Foundation is a national organization actively engaged in the research and development of new therapies for cystic fibrosis—a rare, life-threatening genetic disease that affects more than 30,000 people in the United States. The buildup of thick, sticky mucus in the lungs characteristic of the disease makes people with CF particularly prone to chronic respiratory infections. These chronic infections are punctuated by pulmonary exacerbations, events that are a risk factor for an irreversible decline of lung function and associated with morbidity and mortality. A significant proportion of pulmonary exacerbations are triggered by respiratory viral infections. Continued progression of the disease can result in advanced lung disease so severe that lung transplantation may be the only life extending option.

The absent or malfunctioning protein that causes CF is also associated with a wide range of disease manifestations beyond the lungs, including pancreatic insufficiency that can lead to malnutrition, gastrointestinal issues, biliary cirrhosis, and diabetes mellitus.

While we have seen incredible progress in recent decades for those living with cystic fibrosis, COVID-19 represents a serious threat for this population. The strongest evidence to date on the threat COVID-19 poses to those with CF comes from a global analysis of 181 COVID-19 cases among people with CF.² From that analysis, it appears CF patients with advanced lung disease, those that are post-lung transplantation, and those with diabetes mellitus may be at risk of severe outcomes including death.

¹ <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html>

² Cosgriff, Rebecca et al. "The global impact of SARS-CoV-2 in 181 people with cystic fibrosis." *Journal of Cystic Fibrosis* (2020), in press

Due to the known risks posed by viral infections, the multi-system manifestations of the disease described above, and evidence demonstrating the impacts of COVID-19 infection for those living with CF, the CDC has listed CF as a condition that can put individuals at increased risk for worse outcomes.³

Individuals with Cystic Fibrosis Must Be Prioritized for Access to COVID-19 Vaccines

We are concerned that Massachusetts’ plan inappropriately excludes people with CF from priority COVID-19 vaccine access. We urge the state to revise its vaccine prioritization plan in accordance with recent updates to the CDC’s list of high-risk medical conditions, *People with Certain Medical Conditions*,⁴ so that all individuals with high-risk conditions receive prioritized vaccine access.

On March 29th, the CDC revised the list of high-risk conditions by removing the categories designating conditions as “known to increase risk” or “might increase risk” of severe illness. As noted by the CDC, all conditions contained on the revised list—including CF—meet criteria indicating higher risk for worse outcomes from COVID-19 based on available evidence.

Massachusetts should immediately revise the state’s vaccine allocation plan to align with the CDC’s revised list of high-risk medical conditions. It is critical that the state act quickly to ensure that individuals with CF are able to access COVID-19 vaccines alongside others with high-risk conditions.

Individuals with One High-Risk Condition Should be Prioritized for Access to COVID-19 Vaccines

We also urge Massachusetts to give equal priority to anyone with a condition that puts them at high-risk for severe disease from COVID-19 instead of prioritizing those with two or more comorbid conditions. We recognize the need for sub-group prioritization due to limited vaccine supplies. However, a focus on multiple conditions neglects other indications of disease severity or vulnerability. For instance, individuals with CF with advanced disease may be particularly vulnerable to COVID-19. However, under an allocation scheme prioritizing those with two or more high-risk comorbid conditions according to the CDC, individuals with advanced disease would receive a vaccine after someone with a body mass index above 30 and COPD. We believe that this scenario inappropriately disadvantages someone who should be prioritized for early access to a vaccine, and we recommend removing the criteria related to multiple conditions.

Once again, we thank you for your attention and consideration of people with CF as you tackle these difficult issues. It is critical that vaccine prioritization reflects the latest evidence on risk and supports access for vulnerable populations like those living with CF and other high-risk conditions. We look forward to working with you as the state continues to update allocation recommendations for COVID-19 vaccines.

Sincerely,

Mary B. Dwight
Chief Policy & Advocacy Officer
Senior Vice President, Policy & Advocacy
Cystic Fibrosis Foundation

R. Elaine Cagnina, MD, PhD
Associate Director, Adult CF Care Center
Brigham and Women’s Hospital
Boston, MA

³ <https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html>

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Esra Caylan, MD

Associate Director, Pediatric CF Care Center
Baystate Medical Center
Springfield, MA

Scott Schroeder, MD

Director, Affiliate CF Care Center
Tufts Medical Center
Boston, MA

Ted Kremer, MD

Director, Pediatric CF Care Center
University of Massachusetts Memorial Health Care
Worcester, MA

Leonard Sicilian, MD

Co-Director, Adult CF Care Center
Massachusetts General Hospital
Boston, MA

Cc: The Honorable Charlie Baker, Governor of Massachusetts