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January 26, 2021

Centers for Disease Control and Prevention
Advisory Committee on Immunization Practices
1600 Clifton Road NE
MS H24-8
Atlanta, GA 30329-4027
ATTN: Docket No. CDC-2021-0002

RE: EQUAL VACCINE PRIORITIZATION FOR PEOPLE WITH DIABETES

Dear Members of the CDC Advisory Committee on Immunization Practices (ACIP):

The Diabetes Leadership Council (DLC) and Diabetes Patient Advocacy Coalition (DPAC) respectfully urge you to update vaccine priority guidance to recognize diabetes as a high risk factor for severe complications from COVID-19, regardless of diabetes type. This important revision recognizes the latest evidence that people with type 1 diabetes (T1D) or type 2 diabetes (T2D) have a 3-4x higher risk of severe illness or hospitalization from COVID-19, compared to someone without diabetes. It is the underlying condition of diabetes that matters, irrespective of whether it is T1D or T2D.

This evidence-based adjustment to the vaccine prioritization for people with T1D will facilitate more consistent vaccine rollout across the country. It will help remedy the current state-by-state interpretation patchwork that has patients confused and leaves public health authorities and frontline workers in the difficult position of “sorting” people with diabetes by type rather than their true risk level. Furthermore, the CDC will help accelerate vaccination of 1.6 million Americans with T1D by relying on science, rather than luck or guesswork.

DLC and DPAC have fielded inquiries from members of the diabetes community who are understandably concerned and confused by their state’s vaccine protocols. For example:

- Tennessee updated its vaccination plan to prioritize people with T1D or T2D equally¹, reflecting Vanderbilt University research²
- Ohioans with “severe type 1 diabetes” are in phase 1b, but only if their T1D required hospitalization within the past year and they have a developmental or intellectual disability³
- South Carolina’s vaccination plan refers to the CDC’s list of high-risk medical conditions⁴, which currently recommends different T1D and T2D priorities, but health officials there have indicated they will not distinguish by type when they progress to phase 1c
- A person with T1D living in southern Indiana will find their state’s vaccine priorities adhere to the CDC’s list of high-risk medical conditions, but their status would differ if they lived a few miles east in Kentucky or a few miles west in Illinois

In the absence of clear, scientifically supported CDC guidance related to diabetes and COVID-19 vaccination prioritization, state health authorities and frontline workers are left to do their level best to quickly, efficiently and safely get vaccines in arms. Clearing up confusion now will help smooth transitions for states moving into phase 1c in the coming weeks.

DLC and DPAC recently co-signed a letter with 17 other national health organizations to share our concerns with the CDC and provide data supporting the revised risk classification for T1D.⁵ Diabetes advocates are accustomed to collaborating with one another, but this was by far the largest diabetes-specific sign-on letter in the history of our two organizations.

Data clearly indicate COVID-19 does not distinguish between T1D and T2D; neither should the CDC. We respectfully ask ACIP to revise its guidance and help accelerate vaccination for people with T1D who are at serious risk of complications from COVID-19.

Sincerely,

Diabetes Leadership Council
Diabetes Patient Advocacy Coalition

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DLC is a 501(c)(3) patient advocacy organization comprised of individuals who combine their passion for advocacy with decades of diabetes experience and leadership to advance patients-first policies at the local, state and national levels. Our members – all former leaders of national diabetes organizations – engage policymakers, and public and private sector influencers to call attention to the diabetes epidemic and provide a voice for 34 million Americans living with the disease.

DPAC is a 501(c)(4) patient advocacy organization that turns knowledge into action through grassroots advocacy. DPAC's mission is to ensure quality of and access to care, medications, and devices for patients living with diabetes; and to educate, inspire, and empower patient advocates as well as lawmakers toward meaningful action on diabetes.

¹ Tennessee Department of Health. COVID-19 Vaccination Plan, Version 4.0. January 22, 2021.
https://www.tn.gov/content/dam/tn/health/documents/cedep/novel-coronavirus/COVID-19_Vaccination_Plan.pdf.
Accessed January 25, 2021.

² Gregory JM, Slaughter JC, Duffus SH, et al. COVID-19 severity is tripled in the diabetes community: a prospective analysis of the pandemic's impact in type 1 and type 2 diabetes. *Diabetes Care* 2021 Feb; 44(2): 526-532.
<https://doi.org/10.2337/dc20-2260>.

³ Ohio Vaccine Preparedness Office. Weekly update. January 20, 2021.
<https://www.pharmacy.ohio.gov/Documents/Pubs/Special/COVID19Resources/Ohio%20Pandemic%20Vaccine%20Provider%20Updates.pdf>. Accessed January 25, 2021.

⁴ South Carolina Department of Health and Environmental Control. COVID-19 Vaccine website.
<https://scdhec.gov/covid19/covid-19-vaccine#phase1c>. Accessed January 25, 2021.

⁵ Diabetes Leadership Council website. <https://diabetesleadership.org/topics/diabetes-community-urges-equal-t1d-t2d-vaccine-priority/>. Accessed January 25, 2021.