

VIA EMAIL

Re: “People with Certain Medical Conditions” Guidance

February 26, 2021

On behalf of National Marrow Donor Program (NMDP), I am writing to bring your most urgent attention to the Centers for Disease Control (CDC) and Advisory Committee on Immunization Practices (ACIP) guidance of “People with Certain Medical Conditions” which is being used in vaccine prioritization. This guidance says our patient population (recipients of bone marrow or stem cell transplants) *might be* at increased risk, while we believe there is strong scientific evidence that our patients *are* at increased risk.

Background

NMDP is entrusted by Congress to operate the C.W. Bill Young Cell Transplantation Program that matches unrelated volunteer bone marrow donors with patients in the United States and abroad who have been diagnosed with leukemia, lymphoma, as well as more than 70 otherwise fatal blood disorders and diseases. Under contract with the Department of Health and Human Services/Health Resources & Services Administration (HRSA), the Program is charged with providing equal access for all patients in need of a life-saving cellular therapy. NMDP works to facilitate the timely delivery of bone marrow and other cellular therapies for more than 6,600 patients every year. In addition to matching donors and patients, another of the Program’s primary missions is coordinating the domestic and international delivery of donated bone marrow to patients in the United States and abroad.

The CDC has been a critical partner in ensuring the uninterrupted movement of bone marrow and cellular therapy during the pandemic. We appreciate the CDC for considering our request to renew the waiver in the national interest to allow bone marrow couriers to transport cellular therapies to American patients.

We now ask the CDC to partner again in our organization’s response to the pandemic and reconsider the risk profile of our patient population.

Request

NMDP is requesting consideration of including bone marrow transplant recipients in the CDC/ACIP definition of “Persons with Certain Medical Conditions.”

We appreciate the CDC for acknowledging this guidance “is a living document that may be updated at any time, subject to potentially rapid change as the science evolves.” We attached an emerging report from the Center for International Blood and Marrow Transplant Research (CIMBTR), which demonstrates a high rate of mortality in allogeneic recipients with COVID-19, particularly those over 50 and within a year of transplant (Sharma et. al, 2021). This article was followed by an accompanying editorial from the same journal (also attached) suggesting hematopoietic cell transplant recipients are at an increased risk of morbidity and mortality following infection with SARS-CoV-2.

The CDC guidance defines the increased risk of severe illness from COVID-19 as “hospitalization, admission to the ICU, intubation or mechanical ventilation, or death.” We know bone marrow and blood stem cell transplant recipients are considered at high risk of poor outcomes after COVID-19 based on their immunosuppressed status, and from the report, we know they are at greater risk of death.

We urge the CDC to review our evidence that bone marrow and stem cell transplant recipients are at increased risk and reconsider the urgent position of our patient population and move recipients of bone marrow and stem cell transplants into the primary risk category similar to that of solid organ transplant patients.

The patients and family members who are supported by National Marrow Donor Program, as well as the staff and medical professionals who manage the program and direct patient care, would deeply appreciate your review of this matter to help ensure the uninterrupted flow of life-saving bone marrow products to and from the United States. We appreciate our past partnership and the opportunity to provide further comment.

Please contact me, Dr. Devine, the Chief Medical Officer for National Marrow Donor Program for any additional information you may require.

Thank you,

Sincerely,



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