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Open Public Comment Letter to the Centers for Disease Control Prevention Advisory Committee on Immunization Practices (ACIP)--Prioritization of COVID-19 Vaccines for People Living with HIV Docket No.: CDC-2020-0124

The undersigned organizations are writing to draw attention to evidence that people living with HIV should be considered a priority group for the receipt of COVID-19 vaccines.

While several initial, small studies suggested that HIV infection may not significantly affect outcomes from COVID-19, there are now larger analyses available which have all found evidence of increased risk of hospitalization and mortality. These include studies from the United Kingdom,¹ South Africa,² and New York City and State, USA.^{3,4} Overall the results suggest approximately a doubling risk of hospitalization and death from COVID-19 among people living with HIV compared to HIV-negative counterparts.

While in some cases it is possible that other factors associated with poorer COVID-19 and HIV outcomes – for example, comorbid diseases (including cardiovascular disease, chronic obstructive pulmonary disease, and diabetes) and myriad social determinants of health affecting black, indigenous, and people of color (BIPOC)^{5,6,7} – were not controlled for and potentially contributed to these findings, this would still suggest HIV infection is a reasonable surrogate for a doubled risk of serious outcomes from COVID-19. It is also important to acknowledge the intersectionality of factors that put people at higher risk for COVID-19 that are so prevalent among people living with HIV.^{6,7,8,9}

In alignment with the National Academy of Sciences' prioritization of people living with HIV in its draft Framework for Equitable Allocation of COVID-19 Vaccine,¹⁰ we urge ACIP to take these data into account when establishing additional priority groups for receipt of COVID-19 vaccines beyond those established via interim guidance issued December 3, 2020.¹¹

ACT UP-Fight COVID-19, San Francisco, CA
ADAP Educational Initiative, Columbus, OH
AIDS Action Baltimore, Baltimore, MD
AIDS Alabama, Birmingham, AL
AIDS Cure Research Collaborative, Pittsburgh, PA
AIDS Foundation Chicago, Chicago, IL
AIDS Treatment Activists Coalition, New York, NY
AIDS United, Washington, D.C.
amfAR, New York, NY
Amida Care, New York, NY
APLA Health, Los Angeles, CA
Aunt Rita's Foundation in Phoenix, AZ
AVAC, New York, NY
Aza health, Hawthorne, FL
Black AIDS Institute, Los Angeles, CA
Cascade AIDS Project, Portland, Oregon
Chase Brexton Health Care, Baltimore, MD
Colorado Organizations and Individuals Responding to HIV/AIDS, Denver, CO

Community Education Group, Lost River, WV
Desert AIDS Project, Palm Springs, CA
East Los Angeles Women's Center, Los Angeles, CA
Elizabeth Glaser Pediatric AIDS Foundation, Washington, D.C.
End AIDS Now, New York, NY
Florida Keys HIV Community Planning Partnership, Key West, FL
Foundation for Integrative AIDS Research (FIAR), Brooklyn, NY
Gay Men's Health Crisis, New York, NY
GLMA: Health Professionals Advancing LGBTQ Equality, Washington, D.C.
Guiding Right, Inc, Oklahoma City, OK
HealthHIV, Washington, DC
HIV + Hepatitis Policy Institute, Washington, DC
HIV+Aging Research Project-Palm Springs, CA
Howard Brown Health, Chicago, IL
Human Rights Campaign, Wash, DC
Hyacinth AIDS Foundation, Newark, NJ
iHealth, New York, NY
International Association of Providers of AIDS Care, Washington, DC
International Foundation for Alternative Research in AIDS, Portland, OR
JSI (John Snow, Inc.), Boston, MA
Latino Commission on AIDS, New York, NY
Let's Kick ASS (AIDS Survivor Syndrome), Palm Springs, CA
Lowcountry AIDS Services dba Palmetto Community Care, North Charleston, SC
Marty's Place Affordable Housing Corporation, San Francisco, CA
National Alliance of State and Territorial AIDS Directors, Washington, D.C.
National Coalition for LGBT Health, Washington, DC
National Community Advisory Board for the MACS/WIHS Combined Cohort Study (MWCCS)
Older Women Embracing Life, Baltimore, MD
ONYX Mid-Atlantic, Baltimore, MD
Positive Women's Network-USA
Presbyterian HIV Network, PHEWA, Presbyterian Church USA (PCUSA), Washington, D.C.
Prevention Access Campaign-U=U, Brooklyn, NY
Program for Wellness Restoration, Houston, TX
PWA Coalition, Denver, CO
Rural Health Service Providers Network, Lost River, WV
Shanti Project, San Francisco, CA
SisterLove, Atlanta, GA
Sisters Together and Reaching, Baltimore, MD
SWM, Palm Springs, CA
TAN Health Clinic, Orange, TX
Test Positive Aware Network, Chicago, IL
The AIDS Institute, Washington, DC
The Cherry Fund, Wash, DC
The San Francisco Principles 2020, San Francisco, CA
The Well Project, Brooklyn, NY
Treatment Action Group, New York, NY
Treatment Education Network, Denver, CO
Vivent Health, CO, MO, TX, WI
Zephyr L.T.N.P. Foundation, Inc., Sacramento, CA

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- ¹ Geretti AM, Stockdale AJ, Kelly SH, et al. Outcomes of COVID-19 related hospitalization among people with HIV in the ISARIC WHO Clinical Characterization Protocol (UK): a prospective observational study. *Clin Infect Dis*. 2020 Oct 23:ciaa1605. doi: 10.1093/cid/ciaa1605. <https://academic.oup.com/cid/advance-article/doi/10.1093/cid/ciaa1605/5937133>
- ² Boulle A, Davies MA, Hussey H, et al. Risk factors for COVID-19 death in a population cohort study from the Western Cape Province, South Africa. *Clin Infect Dis*. 2020 Aug 29:ciaa1198. doi: 10.1093/cid/ciaa1198. <https://academic.oup.com/cid/advance-article/doi/10.1093/cid/ciaa1198/5899044>
- ³ Tesoriero JM, Swain CE, Pierce JL, et al. Elevated COVID-19 outcomes among persons living with diagnosed HIV infection in New York State: Results from a population-level match of HIV, COVID-19, and hospitalization databases. *medRxiv*. 2020 Nov 6:2020.11.04.20226118. doi: 10.1101/2020.11.04.20226118. Preprint. <https://www.medrxiv.org/content/10.1101/2020.11.04.20226118v1>
- ⁴ Braunstein SL, Lazar R, Wahnich A, Daskalakis DC, Blackstock OJ. COVID-19 infection among people with HIV in New York City: A population-level analysis of linked surveillance data. *Clin Infect Dis*. 2020 Nov 30:ciaa1793. doi: 10.1093/cid/ciaa1793. <https://academic.oup.com/cid/advance-article/doi/10.1093/cid/ciaa1793/6012626>
- ⁵ Mirzaei H, McFarland W, Karamouzian M, Sharifi H. COVID-19 Among People Living with HIV: A Systematic Review. *AIDS Behav*. 2020 Jul 30:1–8. doi: 10.1007/s10461-020-02983-2. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7391049/>
- ⁶ Poteat T, Millett GA, Nelson LE, Beyrer C. Understanding COVID-19 risks and vulnerabilities among black communities in America: the lethal force of syndemics. *Ann Epidemiol*. 2020 Jul;47:1-3. doi: 10.1016/j.annepidem.2020.05.004. Epub 2020 May 14. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7224650/>
- ⁷ Millett GA. New pathogen, same disparities: why COVID-19 and HIV remain prevalent in U.S. communities of colour and implications for ending the HIV epidemic. *J Int AIDS Soc*. 2020 Nov;23(11):e25639. doi: 10.1002/jia2.25639. <https://onlinelibrary.wiley.com/doi/10.1002/jia2.25639>
- ⁸ Shiao S, Krause KD, Valera P, Swaminathan S, Halkitis PN. The Burden of COVID-19 in People Living with HIV: A Syndemic Perspective. *AIDS Behav*. 2020 Aug;24(8):2244-2249. doi: 10.1007/s10461-020-02871-9. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7165075/>
- ⁹ Brown LB, Spinelli MA, Gandhi M. The interplay between HIV and COVID-19: summary of the data and responses to date. *Curr Opin HIV AIDS*. 2021 Jan;16(1):63-73. doi: 10.1097/COH.0000000000000659. https://journals.lww.com/co-hivandaids/Abstract/2021/01000/The_interplay_between_HIV_and_COVID_19_summary_of.9.aspx
- ¹⁰ National Academies of Sciences, Engineering, and Medicine; Health and Medicine Division; Board on Population Health and Public Health Practice; Board on Health Sciences Policy; Committee on Equitable Allocation of Vaccine for the Novel Coronavirus. Framework for Equitable Allocation of COVID-19 Vaccine. Kahn B, Brown L, Foege W, Gayle H, editors. Washington (DC): National Academies Press (US); 2020 Oct 2. <https://www.nap.edu/catalog/25917/framework-for-equitable-allocation-of-covid-19-vaccine>
- ¹¹ Dooling K, McClung N, Chamberland M, et al. The Advisory Committee on Immunization Practices' Interim Recommendation for Allocating Initial Supplies of COVID-19 Vaccine — United States, 2020. *MMWR Morb Mortal Wkly Rep*. ePub: 3 December 2020. DOI: <http://dx.doi.org/10.15585/mmwr.mm6949e1>