

September 8, 2023

Grace Lee, MD, PhD
Chair
Advisory Committee on Immunization Practices
Centers for Disease Control and Prevention
1600 Clifton Road, NE
Atlanta, GA 30333

Dear Dr. Lee,

CLL Society appreciates the opportunity to submit comments to ACIP on the updated COVID-19 booster.

CLL Society is dedicated to addressing the unmet needs of the chronic lymphocytic leukemia and small lymphocytic lymphoma (CLL/SLL) community through patient education, advocacy, support and research. We are the largest nonprofit focused exclusively on the unmet needs of patients living with CLL and SLL.

Our patients live with a chronic, rare cancer of the immune system. We strive to fulfill our primary mission of ensuring that patients have access to safe and effective treatment options, which includes informing patients and caregivers about the therapeutic landscape. We also stress the importance of clinical trials to those in our community, build and support patient networks, engage in research, and education patients and their caregivers.

As you consider who will receive the updated COVID-19 vaccine for this fall, we urge you to consider the broader needs of the immunocompromised and immunosuppressed (IC/IS), including patients with conditions like CLL, who are at higher risk for lethal COVID-19 infection due to less robust immune responses to vaccinations. One recent analysis found that response in patients with CLL after a full initial vaccine series ranged from 40% to 67% across all studies, compared with a range of 97%–100% in healthy individuals.¹ Patients undergoing treatment for CLL are less likely to develop protective antibodies in response to vaccines than CLL patients not receiving treatment.² We have consistently urged our patient community to ensure that they are fully vaccinated and receive all recommended COVID-19 booster doses, and we strongly agree that the updated FDA monovalent booster shot will provide an additional layer of protection for those in the IC/IS community. We also recognize that vaccines may not afford our patients with the protection they need, particularly if a close contact such as a family member becomes infected. Since reducing exposure to the virus may give many CLL/SLL patients and others in the IC/IS community the best chance of avoiding a potentially fatal COVID-19 infection, access to the monovalent booster for close contacts is a crucial part of a layered approach to help prevent severe infection.

Currently, there have been no additioal booster doses recommended for fully vaccinated adults with normal immune systems since fall of 2022.

¹ Shadman M, Liu C, Eakle K, Hiew HJ, Biondo JML, Ghia P, Mato AR. COVID-19 Vaccination Response and Its Practical Application in Patients With Chronic Lymphocytic Leukemia. Hemisphere. 2022 Dec 20;7(1):e811. doi: 10.1097/HS9.0000000000000811. PMID: 36570695; PMCID: PMC9771252.

² Study: COVID-19 vaccines much less effective for NHL/CLL patients | Winship Cancer Institute (emory.edu)



The ACIP recommendation is of key importance not only to the medical and scientific community, but the payer community as well. If ACIP makes a narrow recommendation that only includes IC/IS patients, close contacts of IC/IS patients may struggle with access to the booster. An expanded recommendation, such as one that includes anyone who lives with an IC/IS patient, would be a much-needed additional layer of protection for IC/IS patients who have had suboptimal responses to the vaccine. Although close contacts could choose not to get the fall booster, this type of recommendation would ensure that it is accessible and affordable for individuals wishing to reduce the chance of exposing an IC/IS individual to infection.

We urge you to provide a flexible recommendation that encourages and facilitates the use of the updated booster in the community that needs it. Please feel free to contact me or our Policy Consultant, M. Kay Scanlan, at 410-504-2324.

Respectfully,

Brian Koffman, MDCM (retired), MS Ed

Co-Founder, Executive Vice President, & Chief Medical Officer

CLL Society