

December 11, 2020

Governor's Medical Advisory Group (GMAG) Subcommittee
Governor's Expert Emergency Epidemic Response Committee
Colorado Governor's Office
202 East Colfax Avenue
Denver, CO 80203

Dear GMAG members-

We have reviewed Colorado's revised COVID-19 vaccination distribution timeline released December 9, 2020 and are supportive of the prioritization of highest-risk health care workers and individuals, and moderate risk health care workers and responders within Phase 1. As Colorado continues to refine how to allocate COVID-19 vaccinations within Phase 2, we request specific consideration of people with intellectual and developmental disabilities and other disabilities who have been found to have significantly increased risk of death following infection with COVID-19.

While the increased risk of mortality experienced by people with disabilities associated with COVID-19 infection requires additional research¹, a recent collaborative research effort between FAIR Health, West Health and John Hopkins University School of Medicine provides significant insight into this issue. *Risk Factors for COVID-19 Mortality Among Privately Insured Patients*², published November 11, 2020, intends to **"inform public health recommendations and policies, particularly those related to protocols for distribution of first-line vaccines..."**³

This study identifies mortality rates based upon the analysis of 467,773 privately insured patients diagnosed with COVID-19 from April 1, 2020, through August 31, 2020 and finds the following comorbidity risk factors for COVID-19 mortality adjusted for age and gender, by odds ratio:

Developmental Disorders ⁴	3.06
Cancer, Lung	2.89

¹ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7254018/>

² <https://s3.amazonaws.com/media2.fairhealth.org/whitepaper/asset/Risk%20Factors%20for%20COVID-19%20Mortality%20among%20Privately%20Insured%20Patients%20-%20A%20Claims%20Data%20Analysis%20-%20A%20FAIR%20Health%20White%20Paper.pdf>

³ Ibid. (page 22)

⁴ "e.g., developmental disorders of speech and language, developmental disorders of scholastic skills, central auditory processing disorders"

Intellectual Disabilities and Related Conditions ⁵	2.75
Spina Bifida/Other Nervous System Anomalies	2.48
Leukemia and Lymphomas	2.20
Chronic Kidney Disease	1.85
Alzheimer’s Disease	1.77
Cancer, Colorectal	1.73
Cancer, Endometrial *	1.73
Mobility Impairments	1.62
Epilepsy	1.59
Heart Failure	1.58
Spinal Cord Injury	1.56
Alzheimer’s Disease/Rel. Disorders/Senile Dementia	1.45
Liver Disease	1.44

*not statistically significant

The concluding remarks state: “While consistent with previous research showing that advanced age, male gender and certain comorbidities are risk factors for COVID-19 mortality, the present study adds details on the impact of COVID-19 on the privately insured population. In particular, our results show that ***developmental disorders, as well as intellectual disabilities and related conditions, are important risk factors for COVID19 mortality***, as are lung cancer and leukemia and lymphomas.”⁶ (emphasis added)

To conclude, this research represents important recent, comprehensive information that should be included to inform Colorado decisions on COVID-19 vaccination prioritization. People with intellectual and developmental disabilities and people with a variety of other disabilities are at increased risk of death following COVID-19 infection. **It is recommended that this information be integrated into Phase 2 vaccine distribution planning and that people with intellectual and developmental disabilities and other disabilities be specifically identified for prioritization.**

Sincerely,
(UNCONFIRMED POTENTIAL SIGNERS APPEAR BELOW)

- CO Developmental Disabilities Council
- CO Speaking for Ourselves
- CO Cross Disability Coalition
- Colorado’s CILs (individually)
- Disability Law Colorado
- JFK Partners
- Arc of CO & Colorado’s Arc Chapters (individually)
- Alliance Colorado

⁵ “e.g., Down syndrome and other chromosomal anomalies; mild, moderate, severe and profound intellectual disabilities; congenital malformations, such as certain disorders that cause microcephaly”

⁶ Risk Factors for COVID-19 Mortality among Privately Insured Patients (page 22)

