



February 12, 2021

Sean McCluskie  
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U.S. Department of Health and Human Services  
200 Independence Avenue  
Washington, DC 20210

Marcella Nunez-Smith, MD, MSc  
Chair  
Biden-Harris Administration COVID-19 Health Equity Task Force  
The White House  
1600 Pennsylvania Avenue, NW  
Washington, DC 20500

Dear Mr. McCluskie and Dr. Nunez-Smith:

The 21,000 kidney care professionals of the American Society of Nephrology (ASN) thank you for your commitment to increasing equitable access to the vaccine for Severe Acute Respiratory Syndrome Coronavirus 2 (SARS-CoV-2) and for all your efforts in responding to Coronavirus Disease 2019 (COVID-19). ASN pledges its support for these and other efforts to expand vaccination access to the more than 550,000 Americans with kidney failure receiving dialysis.<sup>i</sup>

**Given the Biden-Harris' commitments to an equitable COVID-19 response, ASN urges a swift release of a federal COVID-19 vaccine allocation to be distributed equitably to dialysis patients in all dialysis units, improving access for a vulnerable population that is more than half Americans who are Black, Latinx, Asian, Native American, and Native Hawaiian or other Pacific Islanders (NHPs).**

The most vulnerable Medicare beneficiaries to COVID-19 are Americans with kidney failure who are receiving dialysis. People dependent on dialysis—who are disproportionately Black, Latinx, Native American, and NHPs—are extremely vulnerable to the effects of COVID-19, with COVID-associated mortality exceeding 20%, comparable to or even higher than COVID-associated mortality in long-term care facilities.<sup>ii</sup> ASN calls on the federal government to provide a federal COVID-19 vaccine allocation to be distributed to dialysis patients, clinicians, and staff in dialysis units as urgently as possible.

Safe, accelerated, equitable distribution of the COVID-19 vaccine to dialysis patients, clinicians, and staff via dialysis units can occur by:

- Having the two large dialysis organizations (LDOs) coordinate distribution of vaccine from the federal government directly to their patients (nearly 80 percent of dialysis patients in this country) and to small and medium dialysis organizations (approximately 20 percent of the dialysis patients)<sup>iii</sup> and;
- Allowing small/medium dialysis organizations that have the capacity and desire to receive the vaccine directly from the federal government to do so.

Since mid-November 2020, ASN and the dialysis community have discussed these two approaches at length, and all parties are prepared to move expeditiously to distribute.

People on dialysis urgently need direct access to the vaccine. Vaccinating in the dialysis facility where 90 percent of patients receive dialysis thrice weekly is the most expeditious, safe approach. Most patients on dialysis have multiple co-morbidities, heightened vulnerability to COVID-19 infection, and poor outcomes if infected: they are simply unable to safely go to a separate vaccination center or pharmacy and wait in line. Dialysis organizations are also highly experienced vaccinating patients for seasonal influenza annually. On average, 90 percent of patients are vaccinated in one week. Dialysis organizations—particularly the LDOs (DaVita and Fresenius Medical Care)—stand ready to make this direct distribution possible if a federal allocation is provided to dialysis patients and staff.

Approximately 50 percent of dialysis patients in the United States are Black, Latinx, Native American, or NHPs.<sup>iv</sup> Providing a direct federal allocation of COVID-19 vaccines to these minoritized patients through the known, trusted care environments of their dialysis units will expedite their access and help address the racial inequity in vaccine rollout.

Across all people receiving dialysis, mortality was 37% higher during April 2020 as compared to the same calendar-weeks of 2017 to 2019 and 16% higher in subsequent months.<sup>v</sup> This persistent upsurge of mortality is ascribed to documented SARS-CoV-2 infections, undocumented viral infections, and decreased access to necessary non-dialysis-related medical care.<sup>vi</sup>

In addition to providing a direct federal vaccine allocation to dialysis patients, ASN also encourages the federal government to urge states to prioritize these patients in their state vaccine allocation practices.

To protect our vulnerable patient population and the essential workers who care for them, ASN and its more than 21,000 members are ready to help however needed. As part of this commitment, ASN volunteers to serve as a communication channel with the rest of the kidney community.

Again, thank you. ASN appreciates your consideration of this urgent request. To discuss this letter or ASN's recommendations, please contact ASN Executive Vice President Tod Ibrahim at [tibrahim@asn-online.org](mailto:tibrahim@asn-online.org) or (202) 641-1365.

Sincerely,



Susan E. Quaggin, MD, FASN  
President

cc: Rohini Kosoglu  
Christen Linke Young  
Cyrus Shahpar, MD

Ben Wakana  
Cameron Webb, MD  
Rochelle Walensky, MD, MPH

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i United States Renal Data System. 2020 USRDS Annual Data Report: Epidemiology of kidney disease in the United States. National Institutes of Health, National Institute of Diabetes and Digestive and Kidney Diseases, Bethesda, MD, 2020. <https://adr.usrds.org/2020>

ii Sim JJ, et al. COVID-19 and survival in maintenance dialysis. *Kidney Med* [published online ahead of print November 24, 2020]. doi: 10.1016/j.xkme.2020.11.005; <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7685033/>

iii Federal Register Vol 85 No 217 November 9, 2020, p. 71476 Table 1

iv United States Renal Data System. 2020 USRDS Annual Data Report: Epidemiology of kidney disease in the United States. National Institutes of Health, National Institute of Diabetes and Digestive and Kidney Diseases, Bethesda, MD, 2020.

v United States Renal Data System. 2020 USRDS Annual Data Report: Epidemiology of kidney disease in the United States. National Institutes of Health, National Institute of Diabetes and Digestive and Kidney Diseases, Bethesda, MD, 2020. <https://adr.usrds.org/2020>

vi Watson TH, Weiner DE, Yee J, Silberzweig J, for the Outpatient Dialysis Subcommittee of the American Society of Nephrology COVID-19 Response Team. Prioritizing COVID-19 Vaccination in Dialysis. *ASN Kidney News*. Available at <https://www.kidneynews.org/policy-advocacy/leading-edge/prioritizing-covid-19-vaccination-in-dialysis>