

November 4, 2021

**Urgent request for clarity and continuity across Canada regarding application and implementation of a 3<sup>rd</sup> dose of the COVID-19 vaccine for immunocompromised Canadians.**

A Message to Canada's Provincial and Territorial Ministers of Health,

On behalf of the following organizations, we would like to thank you and your departments for your leadership and dedication to working with many partners throughout the COVID-19 pandemic.

Arthritis Society	Asthma Canada	Canadian Cancer Society	Canadian Hospice Palliative Care Association
Canadian Liver Foundation	Canadian Lung Association	Fighting Blindness Canada	Heart & Stroke
Kidney Foundation of Canada	Multiple Sclerosis Society of Canada	Muscular Dystrophy Canada	Ovarian Cancer Canada

We write to you today in response to the National Advisory Committee on Immunization (NACI) release on September 10, 2021 of their "[\*National Advisory Committee on Immunization \(NACI\) rapid response: Additional dose of COVID-19 vaccine in immunocompromised individuals following 1- or 2- dose primary series.\*](#)"

According to NACI, people with moderately to severely compromised immune systems have been observed to generally have lower antibody responses and lower vaccine effectiveness from COVID-19 vaccines than immunocompetent individuals, although this varies depending on the underlying condition or immunosuppressive agents. Recent studies have demonstrated that some people who do not respond after two doses, particularly those who are moderately to severely immunocompromised, develop antibodies after a third dose of an mRNA vaccine; and that there is an increased antibody response following a third dose for some of those who do respond to an initial primary series.<sup>1</sup>

The NACI recommendations in particular, include the following:

1. For those who have not yet been immunized, NACI recommends that moderately to severely immunocompromised individuals in the authorized age groups should be immunized with a primary series of three doses of an authorized mRNA vaccine. (Strong NACI Recommendation)
2. For those moderately to severely immunocompromised individuals in the authorized age groups who have previously received a 1- or 2-dose complete primary COVID-19 vaccine series (with a homologous or heterologous schedule using mRNA or viral vector vaccines), NACI recommends that an additional dose of an authorized mRNA COVID-19 vaccine should be offered. (Strong NACI Recommendation)

Upon review of COVID-19 vaccination guidelines across the country, we are pleased to see that all provinces and territories have indicated that they have or will be implementing NACI's recommendations for 3<sup>rd</sup> dose vaccine for moderately to severely immunocompromised individuals.

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<sup>1</sup> National Advisory Committee on Immunization (NACI) rapid response: Additional dose of COVID-19 vaccine in immunocompromised individuals following 1- or 2- dose primary series. September 10, 2021. <https://www.canada.ca/en/public-health/services/immunization/national-advisory-committee-on-immunization-naci/statement-september-10-2021-additional-dose-covid-19-vaccine-immunocompromised-following-1-2-dose-series.html#a5>

**While this is a critical first step towards protecting the lives of individuals at greater risk of becoming seriously ill with COVID-19, a lack of clarity and continuity (as described below) in the application of these guidelines across the country is minimizing the potential for positive impact of these recommendations.**

Canadians who are moderately to severely immunocompromised remain confused and scared about how COVID-19 will impact them and the ones they love. Many are turning to social media and the internet to find their way through the system to arrange their 3<sup>rd</sup> dose, but oftentimes the information they find can be unclear, contradictory or at times false. Canadians need to be able to rely on the guidance of our healthcare leaders to provide accurate information and effectively implement healthcare protocols which places the lives of Canadians as a priority.

Unfortunately, the lack of clarity and continuity in communicating and implementing this extremely important vaccine recommendation for eligible individuals is in and of itself compromising the health and safety of these vulnerable Canadians.

**To protect the health and safety of Canadians who are moderately to severely immunocompromised, we are asking all provincial and territorial health authorities to implement the NACI recommendations with clarity and continuity across all jurisdictions.**

**CLARITY on the definition of “moderately to severely immunocompromised individuals in the authorized age groups.”**

- NACI’s recommendations include an outline of which conditions should be considered eligible for this 3<sup>rd</sup> dose of COVID-19 vaccine for immunocompromised individuals<sup>2</sup>, however the provincial and territorial information available to Canadians varies significantly across the country<sup>3,4,5</sup>.
- All Canadians who are moderately to severely immunocompromised have the right to clearly understand whether they are eligible for a 3<sup>rd</sup> dose of the COVID-19 vaccine to achieve an adequate level of protection from the standard primary vaccine series.

**CONTINUITY across the country on the implementation of the NACI guidance for 3<sup>rd</sup> dose COVID-19 vaccine for moderately to severely immunocompromised individuals.**

- NACI’s recommendations indicate that the minimal interval between the 1- or 2- dose primary series and the additional dose should be 28 days. As shown with immunogenicity data, an interval longer than the minimum 28 days between doses is likely to result in a better immune response. However, if a longer interval is being considered, then risk factors for exposure (including local epidemiology and circulation of variants of concern) and risk of severe disease should also be considered.<sup>1</sup>
- Provincial and territorial timelines vary across the country with most applying a 28-day (4 week) timeline for this 3<sup>rd</sup> dose, however, Alberta and Ontario, two provinces with significant COVID-19 case counts in recent weeks, are applying a 56-day (8 week) timeline for their 3<sup>rd</sup> dose eligibility.
- Access to 3<sup>rd</sup> dose vaccine varies across provinces & territories, but also varies across local jurisdictions. In some cases, people must wait until they are contacted by their healthcare provider while in some other cases, people can book their own appointments if they feel they meet the eligibility requirements while others need a form or a letter from their healthcare provider for verification of eligibility.<sup>5,6</sup>
- While continuity in availability and access across the country is critical, governments should also ensure healthcare providers have ability to provide COVID-19 vaccines outside of the vaccination schedule and empower them to determine if their patient will benefit from an additional dose, and the timing of the dose, based on their unique circumstances including individual health issues and personalized treatment plans.

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<sup>2</sup> Canada.ca Immunization of immunocompromised persons: Canadian Immunization Guide. <https://www.canada.ca/en/public-health/services/publications/healthy-living/canadian-immunization-guide-part-3-vaccination-specific-populations/page-8-immunization-immunocompromised-persons.html>

<sup>3</sup> NovaScotia.ca COVID-19 Immunization Plan. <https://novascotia.ca/coronavirus/vaccine/#getting-the-vaccine>

<sup>4</sup> Quebec.ca Additional Dose of COVID-19 Vaccine. <https://www.quebec.ca/en/health/health-issues/a-z/2019-coronavirus/progress-of-the-covid-19-vaccination/additional-dose-covid-19-vaccine>

<sup>5</sup> Gov.BC.ca Information for People who are Moderately or Severely Immunocompromised. <https://www.quebec.ca/en/health/health-issues/a-z/2019-coronavirus/progress-of-the-covid-19-vaccination/additional-dose-covid-19-vaccine>

<sup>6</sup> Gov.NL.ca COVID-19 Vaccine: Get the Shot. <https://www.gov.nl.ca/covid-19/vaccine/gettheshot/>

As COVID-19 continues to impact the lives of Canadians, people who are moderately to severely immunocompromised remain vulnerable to the virus as they may not have achieved an adequate level of viral protection based on the 2-dose vaccine protocol. We, the undersigned organizations, urge all provinces and territories in Canada to implement NACI's recommendations for 3<sup>rd</sup> dose of COVID-19 vaccine for moderately to severely immunocompromised individuals as quickly, clearly, and effectively as possible as described in this letter. It is imperative that we address this gap in Canada's COVID-19 health and safety protocols as this may be a matter of life or death for some of our most vulnerable Canadians.

On behalf of the following organizations, many thanks for your consideration.



Canadian  
Cancer  
Society

Société  
canadienne  
du cancer



Canadian Hospice Palliative Care Association  
Association canadienne de soins palliatifs



Canadian Liver Foundation  
Fondation canadienne du foie

B R E A T H E  
the lung association



FIGHTING  
BLINDNESS  
CANADA

VAINCRE  
LA CÉCITÉ  
CANADA



Heart  
&Stroke™

kidney  
FOUNDATION



FONDATION  
DU  
rein



Multiple  
Sclerosis  
Society of  
Canada



MUSCULAR  
DYSTROPHY  
CANADA  
DYSTROPHIE  
MUSCULAIRE  
CANADA



Ovarian Cancer Canada  
Cancer de l'ovaire Canada

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