



May 15, 2026

National Center for Health Statistics
ICD-10 Coordination and Maintenance Committee
3311 Toledo Road
Hyattsville, MD 20782

Electronically transmitted to: nchsicd10CM@cdc.gov

RE: Comments to the Proposed New ICD-10-CM Code T50.B2, “Adverse Effect of the COVID-19 Vaccines”

As members of the Adult Vaccine Access Coalition (AVAC), we appreciate the opportunity to comment on the proposed addition of a COVID-19 vaccine-specific adverse effect code (T50.B25). We wish to share the following concerns with the proposed introduction of a vaccine-specific adverse effect code at this time.

Symptoms of adverse effects potentially resulting from COVID-19 vaccination have significant overlap with other conditions, including long COVID. Presently, there is no clear or established clinical criteria to distinguish post-COVID-19 vaccination syndrome from other conditions. Given this lack of clear clinical criteria, uptake of an ICD-10 code attributing adverse effects to COVID-19 vaccination would likely result in inconsistent provider use and yield data that is unlikely produce clear and meaningful research findings.

COVID-19 vaccines are frequently administered concurrently with other recommended vaccines during the same clinical visit. Consequently, it would be difficult for health care professionals to ascertain which vaccine, or potentially combination of vaccines, resulted in any potential adverse effects. Such confounding factors further limit the utility of a COVID-19 vaccine specific adverse event code.

Existing general vaccine adverse-effect ICD-10 codes support documentation of both the adverse event and the vaccination(s) involved. Vaccine-specific COVID-19 adverse-effect codes may not provide additional information or research value but could add complexity for providers given the lack of clear clinical guidelines for when its use would be appropriate.

The current ICD-10-CM structure captures vaccine-related adverse events based on clinical presentation rather than specific vaccine products. This is consistent with the



current body of scientific evidence and historical precedents and avoids introducing distinctions that may provide little meaningful clinical or scientific value.

For these reasons, AVAC members would encourage the Committee to consider withholding approval of the proposed ICD-10-CM code at this time as you gather additional information and evidence that a new code would create more clarity and transparency in evidence-based clinical decision making. AVAC's broad membership consists of over eighty organizational leaders in health and public health committed to raising awareness of the importance of adult immunization and to addressing the range of barriers to access. AVAC works towards common legislative and regulatory solutions that will help strengthen and enhance access to adult immunization across the health care system. Our priorities and objectives are driven by a consensus process with the goal of enabling the range of stakeholders to have a voice in the effort to improve access and utilization of adult immunizations.

Thank you for the opportunity to offer our perspective and appreciate your consideration.

Sincerely,

Alliance for Aging Research

American Pharmacists Association

Gerontological Society of America

Hepatitis B Foundation

Immunize.org

Infectious Disease Society of America

National Consumers League

Post-Acute and Long-Term Care Medical Association

Society for Maternal-Fetal Medicine

Vaccinate Your Family