

**SELECT A CLASSIFICATION**  
**DoD ISSUANCE COORDINATION RESPONSE**

**COMPONENT COORDINATOR RESPONSE**

October 29, 2021

**SUBJECT:** Proposed Directive-type Memorandum Mandatory Vaccination of Service  
Members using the Pfizer-BioNTech/Comirnaty® Coronavirus Disease 2019  
Vaccines

On behalf of my Component, my formal response to this issuance is: Nonconcur. Below are comments that detail my Component's objections to this issuance.

My point of contact for this action is Lt Col David Sayers, [usaf.pentagon.af-sg.mbx.team-covid-19@mail.mil](mailto:usaf.pentagon.af-sg.mbx.team-covid-19@mail.mil).

**X**

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Double-click the 'X' to insert a digital signature  
or print and sign a hard copy.

**Coordinating Official's Name: JOHN A. FEDRIGO**

**Coordinating Official's Position Title: Acting Assistant Secretary (Manpower and Reserve Affairs)**

**Coordinating Official's Component: Department of the Air Force**

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CLASS	#	PAGE	PARA	BASIS FOR NON-CONCUR?	COMMENTS, JUSTIFICATION, AND ORIGINATOR JUSTIFICATION FOR RESOLUTION	COMPONENT AND POC NAME, PHONE, AND E-MAIL
Choose an item.	1	1	Throu ghout	<input type="checkbox"/>	<p><b>Coordinator Comment and Justification:</b> This memo uses Comirnaty® and COMIRNATY® throughout the document.</p> <p><b>Coordinator Recommended Change:</b> Use either all upper case throughout the document.</p> <p><b>Originator Response:</b> Choose an item.</p> <p><b>Originator Reasoning:</b></p>	<p>AFMRA/SG3PM 703-681-9307 usaf.pentagon.af- sg.mbx.team-covid- 19@mail.mil</p>
U	2		2	<input type="checkbox"/>	<p><b>Coordinator Comment and Justification:</b> original:</p> <p>“Pfizer-BioNTech/COMIRNATY® Fact Sheet for Healthcare Providers Administering Vaccine (reference (a)), Vaccine Information Fact Sheet for Recipients and Caregivers (reference (b)), and the Centers for Disease Control and Prevention’s Morbidity and Mortality Weekly Report (reference (c)), “Comirnaty has the same formulation and can be used interchangeably with the Pfizer-BioNTech COVID”</p> <p>is an incomplete sentence</p> <p><b>Coordinator Recommended Change:</b> consider leading in with IAW with the following references, etc... OR ADD <u>states</u>: “COMIRNATY has the same formulation...”</p> <p><b>Originator Response:</b> Choose an item.</p> <p><b>Originator Reasoning:</b></p>	<p>AFMRA/SG3PM 703-681-9307 usaf.pentagon.af- sg.mbx.team-covid- 19@mail.mil</p>

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U	3		3	<input type="checkbox"/>	<p><b>Coordinator Comment and Justification:</b> Admin change</p> <p><b>Coordinator Recommended Change:</b> change vaccination to vaccinating "and the BLA-manufactured Pfizer-BioNTech/Comirnaty® COVID-19 vaccine interchangeably for the purpose of vaccinating Service members in accordance with Secretary of Defense Memorandum,"</p> <p><b>Originator Response:</b> Choose an item.</p> <p><b>Originator Reasoning:</b></p>	<p>AFMRA/SG3PM 703-681-9307 usaf.pentagon.af-sg.mbx.team-covid-19@mail.mil</p>
U	4		3		<p><b>Coordinator Comment and Justification:</b> Admin change</p> <p><b>Coordinator Recommended Change:</b> remove parenthesis from (EUA and add a period at end of last sentence "the Pfizer-BioNTech COVID-19 vaccine manufactured under EUA and that FDA and CDC has advised that the two vaccines can be used interchangeably without presenting any"</p> <p><b>Originator Response:</b> Choose an item.</p> <p><b>Originator Reasoning:</b></p>	<p>AFMRA/SG3PM 703-681-9307 usaf.pentagon.af-sg.mbx.team-covid-19@mail.mil</p>

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Choose an item.	5	2	1	<input type="checkbox"/>	<p><b>Coordinator Comment and Justification:</b> This counseling can be provided by a Commander or someone in the chain of command. Medical can be available to answer any specific questions.</p> <p><b>Coordinator Recommended Change:</b> Remove "medical". "If a Service member, after <del>medical</del> counseling, declines administration of the EUA-manufactured Pfizer-BioNTech COVID-19 vaccine but will accept the BLA-manufactured product, DoD health care providers should engage with their logistics chain to secure and administer the BLA-manufactured Pfizer-BioNTech/Comirnaty® product prior to any punitive action being taken against the Service member"</p> <p><b>Originator Response:</b> Choose an item.</p> <p><b>Originator Reasoning:</b></p>	<p>AFMRA/SG3PM 703-681-9307 usaf.pentagon.af-sg.mbx.team-covid-19@mail.mil</p>

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	6	1-2	all	<input checked="" type="checkbox"/>	<p><b>Coordinator Comment and Justification:</b> Significant concerns with the memo statement "Service members who request the BLA-manufactured Pfizer-BioNTech/Comirnaty COVID-19 vaccine for the primary two-dose series shall be informed of FDA guidance on Pfizer-BioNTech/Comirnaty®'s BLA formulation being the same as the Pfizer-BioNTech COVID-19 vaccine manufactured under (EUA and that FDA and CDC has advised that the two vaccines can be used interchangeably without presenting any safety or effectiveness concerns. If a Service member, after medical counseling, declines administration of the EUA-manufactured Pfizer-BioNTech COVID-19 vaccine but will accept the BLA-manufactured product, DoD health care providers should engage with their logistics chain to secure and administer the BLA-manufactured Pfizer-BioNTech/Comirnaty® product prior to any punitive action being taken against the Service member."</p> <p>The memo states the vaccines can be used interchangeably; however, this paragraph would suggest DoD considers them different, and as different, cannot carry out punitive action against the Service member until they have the opportunity for a BLA-manufactured vaccine. This subverts our current DAF vaccination mandate and may open up the Air Force for increased litigation from individuals who have been mandated since 24 August to be vaccinated. If there is no difference that can otherwise be communicated, we recommend non-concur with this paragraph as it subverts current policy. We are all operating under the belief that the lot issue is a distinction without a difference from a health/safety/medical/legal perspective. As the services have taken action, possibly include adverse action, based on a belief that the distinction is one without meaningful difference, OSD retrenchment signifying that the distinction does matter would probably require significant remedial actions.</p> <p><b>Coordinator Recommended Change:</b> <u>Non-concur as written.</u></p> <p><b>Originator Response:</b> Choose an item.</p>	<p>AFMRA/SG3PM 703-681-9307 usaf.pentagon.af-sg.mbx.team-covid-19@mail.mil</p>

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					Originator Reasoning:	

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### HOW TO FILL OUT THE DD 818 MATRIX

#### GENERAL GUIDANCE:

- **To sort table** by page/paragraph number, hover your mouse over the top of the first cell in the "page" column until a downward arrow appears; click and drag to the right to select both page and para columns. Under Paragraph on the Home ribbon, select A-Z button, set to sort by Column 3 and then Column 4, and select "OK." **To add new rows**, copy and paste a blank row to keep consistent formatting. **To add automatic numbering to column 2**, select entire column and click on the Numbering button under Paragraph on the Home ribbon.

#### COORDINATING OSD AND DOD COMPONENTS:

- Do not use the DD Form 818-1.
- Fill in the memo indicating your Component's position on the issuance. Fill in the authorized coordinator's name, position, and Component. The authorized coordinator (digitally) signs the response after the comment matrix has been completed. **Making additional changes after filling in a digital signature invalidates and removes the signature.**
- Use the comment matrix to provide comments to the OSD Component that created the issuance. Complete the header and footer and Columns 1 -7:
 

<i>COLUMN 1</i>	Enter the classification of the comment. If any material is <b>classified</b> , follow DoDM 5200.01 guidance for marking the document. If all comments are unclassified, mark the header and footer and ignore the column.
<i>COLUMN 2</i>	Order comments by the pages/paragraphs that they apply to in Columns 3 and 4.
<i>COLUMNS 3&amp;4</i>	As stated.
<i>COLUMNS 5</i>	Only mark this box if you non-concur with the issuance and the comment in the applicable row is part of the basis for that non-concur. A nonconcur is typically used only when an issuance contains: (a) a violation of the law or contradiction of Executive Branch policy or of existing policy in a DoDD, DoDI, or other instrument approved by the Secretary or Deputy Secretary of Defense; or (b) an unnecessary risk to safety, life, limb, or DoD materiel; waste or abuse of DoD appropriations; or unreasonable burden on a DoD Component's resources.
<i>COLUMN 6</i>	Place only one comment per row. Enter your comment, justification, and recommended changes in the first two areas provided. If any material is <b>classified</b> , follow DoDM 5200.01 guidance for marking the document.
<i>COLUMN 7</i>	As stated.

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- **Review** the comments, **resolve** any conflicting views, and **confirm** that the completed matrix accurately represents your Component's position. Upload the form to the DoD Directives Program Portal in **Microsoft Word format (.docx)**, with the signed memo representing your Component's position.