



December 3, 2020

Advisory Committee on Immunization Practices
c/o Centers for Disease Control and Prevention
1600 Clifton Road NE, MS H24-8
Atlanta, GA 30329-4027

Re: Docket No. CDC-2020-0121 - Phase 1B COVID-19 Vaccine Distribution

Dear Chairman Romero and Members of the Committee:

The undersigned organizations commend your efforts to develop and administer a safe and effective COVID-19 vaccine. As you evaluate the Centers for Disease Control and Prevention’s (CDC) national plan for distribution of limited vaccine supplies to non-healthcare essential workers, we ask you to consider the needs of heating, ventilation, air conditioning, and refrigeration (HVACR) technicians, plumbing and utility service professionals, and heating fuel delivery drivers.

A resurgent virus and second wave of COVID-19 infections come as colder temperatures descend on much of the nation and millions of American families are driven indoors. In fact, we believe a record number of Americans may work, study, and celebrate the holidays from home this winter. They continue to rely on local utilities and home heating fuel providers and related service professionals for their continued health, warmth, and safety.

We applaud the Advisory Committee on Immunization Practices’ (ACIP) recent recommendation that healthcare professionals, long-term care facilities, and the most vulnerable seniors be given priority access to vaccines during its Phase 1A distribution.ⁱ The ACIP will soon meet to discuss recommendations for Phase 1B distribution of limited vaccine supplies to critical infrastructure workers in other sectors of the economy as identified by the Cybersecurity & Infrastructure Security Agency (CISA). HVACR technicians, plumbing and utility service professionals, and heating fuel delivery drivers are included in CISA’s most recent list of critical infrastructure workers.ⁱⁱ

In many cases, these professionals must enter a customer’s home or business to service, repair, or replace plumbing, heating or ventilation systems, refrigeration units, or related appliances and equipment. They may also be required to interact with homeowners, tenants, or their family members. Some of these residents may be members of vulnerable populations. These workers always wear personal protective equipment and strictly abide by CDC guidelines to protect themselves and their customers. Unfortunately, there is always a risk of exposure, especially in smaller residential units. We ask that these factors be considered as you advise the CDC on next steps in the national vaccine plan and, specifically, how access will be prioritized to critical workers in Phase 1B.

We recognize that successful deployment of COVID-19 vaccines does not rest exclusively with the federal government, the CDC, or national medical organizations. Equally important will be the vaccine distribution plans written by state and local governments, healthcare providers, and essential businesses in all sectors of the economy. However, we believe detailed and consistent guidance at the federal level will be pivotal for seamless vaccine distribution among all stakeholders, help to ensure the long-term health of American families and workers, and bolster the national economic recovery.

Our industries and hardworking professionals will continue to do their part to ensure Americans remain safe, healthy, and warm no matter what the pandemic or this winter may bring. We hope you will consider the important role they play as you discuss and consider recommendations for Phase 1B vaccine distribution in the days ahead.

Thank you in advance for your consideration.

Sincerely,

Air Movement and Control Association (AMCA)	www.amca.org
American Public Gas Association (APGA)	www.apga.org
Indoor Air Quality Association (IAQA)	www.iaqa.org
National Air Duct Cleaners Association (NADCA)	www.nadca.com
National Association of Oil & Energy Service Professionals (OESP)	www.thinkoesp.com
National Energy & Fuels Institute (NEFI)	www.nefi.com
Plumbing-Heating-Cooling Contractors - National Association	www.phccweb.org
Refrigeration Service Engineers Society (RSES)	www.rses.org
Women in Energy	www.wewomeninenergy.com
Women in HVACR	www.womeninhvacr.org

cc: The Honorable Alex M. Azar, U.S. Secretary of Health & Human Services
The Honorable Dan Brouillette, U.S. Secretary of Energy
The Honorable Elaine Chao, U.S. Secretary of Transportation
The Honorable Dr. Robert Redfield, MD, Director, Centers for Disease Control & Prevention
The Honorable Dr. Francis Collins, MD, PhD, Director, National Institutes of Health

ⁱ The CDC's *COVID-19 Vaccine Program Interim Playbook for Jurisdiction Operations* was published Oct. 29, 2020. https://www.cdc.gov/vaccines/imz-managers/downloads/COVID-19-Vaccination-Program-Interim_Playbook.pdf. On December 1, 2020, the ACIP recommended prioritization of healthcare providers and long-term care facilities as part of the Intermit Playbook's Phase 1a vaccine distribution plan.

ⁱⁱ U.S. Cybersecurity & Infrastructure Security Agency (CISA), *Essential Critical Workers Guidance Document*, Version 4.0 (August 18, 2020), pages 13, 18, and 23. https://www.cisa.gov/sites/default/files/publications/Version_4.0_CISA_Guidance_on_Essential_Critical_Infrastructure_Workers_FINAL%20AUG%2018v3.pdf.