

November 30, 2020

Alex M. Azar Secretary U.S. Department of Health and Human Services Moncef Mohamed Slaoui Chief Advisor Operation Warp Speed

Robert R. Redfield, M.D. Director
U.S. Centers for Disease Control and Prevention

Dear Secretary Azar, Director Redfield, and Chief Advisor Slaoui:

As the nation prepares for the distribution and administration of COVID-19 vaccines in coming weeks, I am writing to emphasize the critical importance of including laboratory personnel in the category of essential health care workers for prioritized vaccination allocation. The American Clinical Laboratory Association (ACLA) is the national trade association representing leading laboratories that deliver essential diagnostic health information to patients and providers. ACLA members are at the forefront of driving diagnostic innovation to meet the country's evolving health care needs and provide vital clinical laboratory tests that identify and prevent infectious, acute, and chronic disease. The association's members also have been a critical component of the response to the COVID-19 pandemic, having performed over 70 million COVID-19 diagnostic and serologic tests to date.

Laboratory professionals are on the frontlines of the COVID-19 response, working around the clock to process tests as quickly as possible and provide critical results to patients, health care providers, and public health agencies. Every day, laboratory personnel including technicians are at risk of direct exposure to the SARS-CoV-2 virus through handling of patient specimens and processing of tests. As noted in the Advisory Committee on Immunization Practices (ACIP)'s Ethical Principles for Allocating Initial Supplies of COVID-19 Vaccine: "The ability of essential workers, including health care workers and non-health care workers, to remain healthy has a multiplier effect (i.e., their ability to remain healthy helps to protect the health of others or to minimize societal and economic disruption)." Without a healthy laboratory workforce, clinical laboratories will be unable to maintain the high volume of testing that is critical to our nation's COVID-19 public health response and economic recovery.

It is imperative that laboratory personnel who are frontline health care workers have priority access to vaccines in order to continue our collective fight against COVID-19. We applaud ACIP's initial recommendations that include essential health care workers as one of four prioritized categories for COVID-19 vaccination allocation. In an August 18 guidance, the U.S. Department of Homeland Security Cybersecurity and Infrastructure Security Agency included laboratory personnel, phlebotomists, and diagnostic and therapeutic technicians as examples of

¹ Advisory Committee on Immunization Practices' Ethical Principles for Allocating Initial Supplies of COVID-19 Vaccine (Nov. 27, 2020), *available at* https://www.cdc.gov/mmwr/volumes/69/wr/mm6947e3.htm?s_cid=mm6947e3_w

essential critical infrastructure workers for the COVID-19 pandemic.² As the laboratory workforce is a critical component of our nation's response to COVID-19, we strongly urge inclusion of laboratory personnel in the category of essential health care workers for vaccine prioritization.

Thank you for your leadership during these unprecedented times. ACLA remains committed to partnering with you to support our nation's public health response to COVID-19.

Sincerely,

Julie Khani, President

American Clinical Laboratory Association

² Guidance on the Essential Critical Infrastructure Workforce: Ensuring Community and National Resilience in COVID-19 Response Version 4.0 (Aug. 18, 2020), *available at* https://www.cisa.gov/sites/default/files/publications/Version_4.0_CISA_Guidance_on_Essential_Critical_Infrastructure_Workers_FINAL%20AUG%2018v2_0.pdf