



December 3, 2020

Mr. Rich Lakin, MSPH, MPA
Immunizations Director
Utah Department of Health
Bureau of Epidemiology
PO Box 142102
Salt Lake City, UT 84114-2102

Dear Director Lakin:

As a state plan for the allocation of COVID-19 vaccinations is formulated, BioUtah urges you to include employees of Utah's life sciences companies among priority recipients of the vaccines as essential workers. Specifically, per the state's current COVID-19 vaccination plan¹ and anticipated timeline for distribution, we urge that our industry's workers be categorized as essential workers/critical infrastructure workers in the early waves of Phase 1b (February-March) and that Health Care Industry Representatives (HCIRs) in the medical device sector be aligned with essential healthcare workers in Phase 1a (Late December-January).

With the first doses of COVID-19 vaccines potentially arriving in Utah in just a matter of weeks, we recognize the many challenges around vaccine deployment. We appreciate your leadership and commitment to making our communities safe, and that vaccines be distributed in a fair, ethical, and transparent way.

Utah's life sciences industry of more than 1,000 companies is diverse, with strengths in medical device manufacturing, diagnostics and biopharmaceuticals, all of which are crucial to the provision of health-care services. For purposes of determining vaccine allocation, we ask that you take into account the following aspects of our workforce.

First, Utah's life sciences workforce plays a key role in responding to COVID-19 and its health impacts, as well as providing a range of medical products and diagnostics for patients with serious disease and debilitating conditions. More than 50 of our life sciences companies are on the frontlines of fighting COVID-19, providing medication delivery, test kits, testing supplies, clinical laboratory testing and personal protection equipment. Others produce cutting-edge medical technologies and treatments to address numerous healthcare conditions, such as heart disease, cancer, stroke and much more. In both instances, facilities must remain open with a stable workforce to continue to furnish life-saving and life-extending medical products without supply disruptions, and at the same time, provide optimal safety for employees.

Second, our industry's workers are already recognized as essential in the U.S. Department of Homeland Security's Cybersecurity & Infrastructure Security Agency's definition of critical infrastructure workers. (*Essential Critical Infrastructure Workers Guidance Version 4.0*)². Language in the guidance includes:

Workers, including laboratory personnel, that perform critical clinical, biomedical and other research, development, and testing needed for COVID-19 or other diseases... Workers at manufac-

¹COVID-19 Vaccination Plan, Utah Department of Health; Rich Lakin, Immunization Program, Utah Department of Health, Version Number 1, available at https://coronavirus-download.utah.gov/Health/COVID-19_Vaccination_Plan.pdf

² Department of Homeland Security Cybersecurity & Infrastructure Security Agency, *Guidance on the U.S. 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_AUG_18v3.pdf

urers (including biotechnology companies and those companies that have shifted production to medical supplies), materials and parts suppliers, technicians, logistics and warehouse operators, printers, packagers, distributors of medical products and equipment (including third party logistics providers, and those who test and repair), personal protective equipment (PPE), isolation barriers, medical gases, pharmaceuticals (including materials used in radioactive drugs), dietary supplements, commercial health products, blood and blood products, vaccines, testing materials, laboratory supplies, cleaning, sanitizing, disinfecting or sterilization supplies.

Similarly, our industry has been deemed essential under state and county ordinances related to COVID-19 “shelter-in-place” orders.

Third, approximately 43,000 Utahns work directly in the state’s life sciences industry. A subset of these workers cannot work from home as their jobs are on the manufacturing floor or in the laboratory where they must adhere to certain shifts and schedules to maintain operations, and where physical distancing may not be possible. In addition, work functions can be very specialized, requiring skill sets that can make it difficult to substitute workers when they’ve been exposed to COVID-19 or have been diagnosed with the virus.

Importantly, some medical device companies employ clinical field representatives, known as HCIRs. They are employees of the device companies and often support procedures/equipment/technology in the operating room or procedural suite and are required to be present during urgent, non-elective procedures (e.g., cardiac, trauma, transplant) and other medically necessary procedures (e.g., joint replacement). Generally, HCIRs must meet certain hospital supplier credentialing requirements to access certain areas of a hospital at the request of a healthcare provider. These credentialing requirements include documentation of certain vaccinations. In order to continue to work seamlessly alongside the clinical team, HCIRs, who have high-exposure risk to COVID-19, should be closely aligned with essential healthcare workers under the state vaccination plan.

Finally, we understand that the Center for Disease Control’s Advisory Committee for Immunization Practices is making recommendations on populations that should be vaccinated in the initial phases of distribution. We also understand that these recommendations will help inform Utah’s blueprint for allocation. However, states will make final determinations for prioritization and, as such, we would welcome the opportunity to further discuss our concerns and position with you.

Again, we urge you to include Utah’s life sciences employees in the vaccinations of the first risk level of essential workers and treat HCIRs as essential healthcare workers.

Thank you for your consideration.

Sincerely,



Kelvyn Cullimore
President and CEO
BioUtah

cc: Governor Gary Herbert
Governor-elect Spencer Cox
Jess Anderson, Commissioner, Utah Department of Public Safety
Richard Saunders, Executive Director, Utah Department of Health