



December 22, 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:

On behalf of the life sciences industry in Utah, we appreciate your leadership and unprecedented efforts, along with Governor Gary Herbert, Governor-Elect Spencer Cox and Department of Public Safety Commissioner, Jess Anderson, to bring COVID-19 vaccines to Utahans. We also support the current prioritization of certain segments of the population, including essential healthcare workers, residents of long-term care facilities and teachers.

As vaccine doses continue to be distributed under the state's prioritization plan¹, BioUtah would like to call your attention to the critical work of clinical laboratory personnel (laboratory personnel) **performing COVID-19 testing** and their risk of exposure, and request that their roles in responding on the front lines be taken into account as you continue to prioritize vaccine allocation.

In our December 3 letter, we referenced laboratory/diagnostics personnel and other life sciences workers as "critical infrastructure workers" as defined by the August 18 guidance issued by the U.S. Department of Homeland Security Cybersecurity and Infrastructure Security Agency². This guidance cited laboratory personnel, phlebotomists, and diagnostic and therapeutic technicians as examples of essential critical infrastructure workers for the COVID-19 pandemic. Such guidance could conceivably place these essential workers in the state's Phase 1b timeline for purposes of vaccine distribution.

While we agree with this general placement, we do see the need to further evaluate whether laboratory personnel involved with the handling and performing of COVID-19 tests should be subcategorized within the definition of critical infrastructure workers and be covered as priority recipients in the earliest phases of state vaccinations - ideally Phase 1a (Late December-January).

A number of Utah companies, such as ARUP, Myriad Genetics, PolarityTE, Soft Cell Bio, IDbyDNA, Sports Medicine Research and Testing Lab and Quansys Biosciences, are performing COVID-19 tests (diagnostic and antibody). These laboratory personnel are in the forefront of our battle against COVID-19 - on the job around the clock to process tests as quickly

¹ COVID-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 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%202018v2_0.pdf

as possible and provide critical results to patients, healthcare providers, and public health agencies. Every day, some of the laboratory personnel 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 Vaccine³, the ability of healthcare workers to remain healthy helps to protect the health of others. 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.

In closing, we understand the complexities involved in developing vaccine priorities and hope BioUtah can serve as a thoughtful contributor in that process. To that end, we would welcome the opportunity to discuss how best to prioritize laboratory personnel engaged in COVID-19 testing to protect their ability to deliver high-demand testing and protect public health.

Again, thank you. BioUtah remains committed to partnering with you to advance Utah's fight against COVID-19.

Sincerely,

A handwritten signature in black ink, appearing to read "Kelvyn Cullimore". The signature is fluid and cursive, with a prominent initial "K".

Kelvyn Cullimore
President and CEO
BioUtah

cc: Governor Gary Herbert
Governor-Elect Spencer Cox
Commissioner Jess Anderson
Jon Pierpont

³ 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