

December 11, 2020

U.S. Centers for Disease Control and Prevention  
Docket No. CDC-2020-0122

## **Criteria for Sub-Prioritizing COVID-19 Vaccination Among Essential Workers: Recommendations from the Food, Agriculture and Consumer Goods Industries**

The following are considerations for prioritizing essential workers within the food, agriculture, consumer goods, retail, and foodservice sectors for COVID-19 vaccination during the early phase of vaccine production and distribution; particularly when vaccine supplies are not sufficiently available for widespread allocation to the general population. CDC's *COVID-19 Vaccination Program Interim Playbook for Jurisdiction Operations* designates this as Phase 1b.<sup>1</sup> As vaccine supplies and needs at the local levels will vary from locality to locality and state to state, these criteria will likely need to be tailored to local conditions in coordinating with companies/employers within these Phase 1b sectors.

The undersigned organizations will continue to reinforce the importance of social distancing, using face masks, sanitizing, and using other protective measures to help minimize the risk of infection and spread, even for fully vaccinated employees (received all required doses), until there is strong evidence that vaccinations are protective for both reinfection and spread of the virus.

### High priority (Phase 1b)

- Essential Critical Infrastructure Workers within the food, agriculture, and consumer goods sectors, including retail, foodservice, *etc.*, as defined by the U.S. Department of Homeland Security Cybersecurity & Infrastructure Security Agency's *Advisory Memorandum on Identification of Essential Critical Infrastructure Workers During COVID-19 Response*,<sup>2</sup> in roles that require on-site labor (*e.g.*, not able to telework and with a hands-on role in food production, storage and distribution) and other critical employees, such as:

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<sup>1</sup> U.S. Centers for Disease Control and Prevention. [https://www.cdc.gov/vaccines/imz-managers/downloads/COVID-19-Vaccination-Program-Interim\\_Playbook.pdf](https://www.cdc.gov/vaccines/imz-managers/downloads/COVID-19-Vaccination-Program-Interim_Playbook.pdf)

<sup>2</sup> U.S. Department of Homeland Security Cybersecurity & Infrastructure Security Agency, [Advisory Memorandum on Identification of Essential Critical Infrastructure Workers During COVID-19 Response – March 28, 2020.](#)

- Certain food and CPG processing/production, logistics, maintenance, sanitation, and other employees, working onsite or off-site, who are critical for operations to remain functional;
- Employees with frequent, required engagement with the public or other workers where social distancing may not be possible at all times, masks and other protective measures may be in place, but prolonged interaction with others is required (*e.g.*, retail/grocery store clerks, vending operators, restaurant wait staff, cooks, delivery/order assembly personnel, food manufacturing/production employees working in close proximity, *etc.*); and
- Employees who work in hot and humid conditions or other situations that make mask wearing for long periods of time more difficult or uncomfortable.
- Certain distribution and supply chain truck drivers (This workforce is facing significant shortages in certain areas and may need to be prioritized in such cases.)
- Employees over 65 (or another age).
- Employees with underlying health conditions, including heart disease, cancer, obesity, diabetes, pregnancy, *etc.*
- Employees living in congregate housing or using shared transportation to and from work.
- Employees living or working in jurisdictions with a high illness rate (>5% positivity and/or 10 cases/100K).

Lower Priority (Phases 2 and 3)

- Non-critical office and other employees (except those who meet criteria in 1b) who can easily maintain social distancing standards during their time at work (which could include certain truck drivers and delivery personnel where local labor shortages are not a concern).

As organizations representing the food, agriculture, retail, and consumer packaged goods supply chain, we look to partner with federal, state and local public health officials to help reinforce the importance and safety of vaccinations and ensure our essential workers can access and receive vaccinations as they become available.

Respectfully submitted,

American Bakers Association  
 American Beverage Association  
 American Cleaning Institute  
 American Frozen Food Institute  
 Consumer Brands Association

Corn Refiners Association  
Global Cold Chain Alliance  
International Dairy Foods Association  
International Foodservice Distributors Association  
National Automatic Merchandising Association  
National Beer Wholesalers Association  
National Confectioners Association  
National Fisheries Institute  
National Grain and Feed Association  
National Grocers Association  
National Milk Producers Federation  
National Oilseed Processors Association  
National Restaurant Association  
National Turkey Federation  
North American Meat Institute  
North American Millers' Association  
Peanut and Tree Nut Processors Association  
SNAC International  
United Fresh Produce Association