

December 22, 2020

Erica Pan, M.D., MPH
Acting State Health Officer
California Department of Public Health
Co-Chair, Community Vaccine Advisory Committee

Nadine Burke Harris, M.D., MPH
California Surgeon General
California Department of Public Health
Co-Chair, Community Vaccine Advisory Committee

Sent Via Email: COVID19VaccineOutreach@cdph.ca.gov

Re: CalChamber Public Comment

Dear California Department of Public Health:

The California Chamber of Commerce (CalChamber) has more than 14,000 members which represents one-quarter of the private sector jobs in California. Our membership includes firms of all sizes and companies from every industry within the state. While CalChamber counts some of California's largest employers as members, more than two-thirds of its members have 100 or fewer employees.

The pandemic has impacted everyone throughout our state, country and the world. Determining the order and priority of vaccination distribution is certainly a challenging feat. However, when viewing the task of vaccine distribution through a lens of equity and social benefit, it becomes slightly easier to decipher categories of individuals/workers who should be prioritized in the distribution.

Obviously, frontline health care workers who have placed themselves in harm's way for the past nine months must receive priority in the distribution hierarchy. Employees and residents in congregate healthcare facilities who are at a higher risk of exposure and severe infection should also be in the first round of distribution.

Thereafter, the distribution of the vaccine should be prioritized based on the totality of several factors: workers who provide critical services necessary for survival, who are consistently exposed to the public, have comorbidities, live in shared congregate workplace housing, and offer stability to society and the economy.

Specifically, prioritization must be given to:

- Workers in the supply chain who are directly responsible for ensuring the safe and timely delivery of the vaccine itself;
- The most at-risk members of society when holistically considering comorbidities, virus exposure, living situation and ability to safely isolate, function and necessity of their critical work;
- Teachers, educators, and childcare providers who must return to the classroom and childcare settings for the benefit of children and so that parents can return to work when safe;
- Agricultural, food, beverage, medication/nutritional supplement workers who provide essential and necessary products to the population.

We appreciate your efforts in organizing California's vaccine distribution plan and will continue to partner with the CDPH to ensure the most at-risk members of society and indispensable critical workers are equitably prioritized.

Sincerely,

A handwritten signature in black ink, appearing to read "Preston Young".

Preston Young
Policy Advocate

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