



**Association of Immunization Managers (AIM) Public Comments on
Advisory Committee on Immunization Practices (ACIP) Emergency Meeting:
Pfizer/BioNTech COVID-19 Vaccine**

December 12, 2020

Thank you for the opportunity to provide public comment on this truly historic day. I am Claire Hannan, executive director of the Association of the Immunization Managers. Our nonprofit represents the state, territorial, large urban area public health immunization programs. These amazing government employees have been working with CDC, Operation Warp Speed, state health officials, governors, hospitals, and other stakeholders across their jurisdictions to plan for the distribution of COVID-19 vaccine. Months of vaccine distribution and logistics planning are now coming to fruition.

Guidance on subsequent priority groups is needed immediately. Jurisdictions are working now to plan for vaccine allocations coming in the next month. They need to work closely with providers and communicate clearly with consumers about what to expect. Many have advisory committees and ethics groups designed to assure equity in distribution. They cannot effectively plan and communicate expectations without guidance from the ACIP.

I want to specifically speak to the dilemma facing jurisdictions with essential workers, those over 65, and those with underlying conditions. There is not consensus across states on this issue. Some governors have signaled the importance of vaccinating those most at risk for hospitalization and death, older Americans, and those with multiple risk conditions. This may lead to very different approaches across states.

Essential workers may be in harm's way and can spread the virus in communities. The current definition of essential workers is extremely broad. For example, the CISA list for essential workers encompasses almost 70% of the U.S. population. If this group is prioritized, states would appreciate guidance for which essential workers should be vaccinated first. Additionally, talking points and communication guidance will be needed to explain why essential workers who may not be at high risk for severe disease are being vaccinated before people 65 and older and those with underlying health conditions. I urge the ACIP to provide specific guidance on prioritization as soon as possible.

Educational materials are needed on exactly who should receive the vaccine, especially related to pregnant and lactating women, 16- to 17-year-olds, and those with allergies. Screening questions that can be used by providers at administration sites would be very helpful, so I am very glad to hear about CDC's "what you need to know" information for potential vaccine recipients.

I would like to close by reminding the committee and everyone listening of the dire need for additional funding for state, territorial, and local public health agencies. Public health agencies have received just \$340 million, while more than \$10 billion has been invested in vaccine research and production. Public health agencies desperately need funding to continue to enroll tens of thousands of providers, to hire community vaccinators and nurses, to purchase equipment and supplies, and to roll out large-scale communication plans with websites, educational materials, and hotlines. Nothing is more important to the success of this

vaccination campaign than the trust of health care workers, nursing home residents, and eventually all Americans in every community about the safety effectiveness of this vaccine. Resources are needed to ensure this success. Thank you.