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February 2, 2021

James S. Blumenstock
Senior Vice President
Pandemic Response and Recovery
Association of State and Territorial Health Officials
2231 Crystal Drive, Suite 450
Arlington, VA 22202

RE: COVID-19 Vaccination for Water and Wastewater Workers

Dear Mr. Blumenstock:

As States and Territories develop and implement their plans for distribution of the COVID-19 vaccine, the Water Environment Federation (WEF) asks that the Association of State and Territorial Health Officials (ASTHO) actively supports the designation of frontline water and wastewater utility workers as essential workers eligible for priority in Phase 1B or 1C of a state's vaccine program. These phases include "frontline essential workers as the subset of essential workers likely at greatest risk for work-related exposure to SARS-CoV-2, the virus that causes COVID-19, because their work-related duties must be performed on site and involve being in close contact (within 6 feet for a total of 15 minutes or more) to the public or coworkers" as described in the January 2021 Centers for Diseases Control and Prevention (CDC) *COVID-19 Vaccination Program Interim Playbook for Jurisdictions Operations Annex*.

Vaccinating frontline water and wastewater utility workers is particularly important because water and wastewater sector services underpin all aspects of society, including hospitals, medical centers, and long-term care facilities. Because utility operations require workers with specialized skills and licenses, and because there are challenges in finding replacements for workers who may become ill or exposed, it is essential to protect such workers and to mitigate their risk of exposure to COVID-19.

The importance of protecting water and wastewater workers was established early in the COVID-19 crisis. In a March 27, 2020, letter to Governors, the U.S. Environmental Protection Agency requested "that water and wastewater workers, as well as the manufacturers and suppliers who provide vital services and materials to the water sector, are considered essential workers and businesses by state authorities when enacting restrictions to curb the spread of COVID-19." An August 18, 2020, Advisory Memorandum from the U.S.

Department of Homeland Security reinforced the importance of water and wastewater workers as members of the “Essential Critical Infrastructure Workforce” advisory list.

WEF understands the challenges that States and Territories face in combating the spread of the virus and maintaining community and economic stability. For these reasons, we request ASTHO’s assistance in encouraging the appropriate regional authorities to prioritize water and wastewater workers as essential workers eligible for Phases 1B or 1C of a state’s allocation of the vaccine.

Please contact me if you have any questions or would like to discuss vaccine prioritization for our nation’s water and wastewater workers.

Sincerely,

A handwritten signature in black ink, appearing to read "Walter T. Marlowe", with a long horizontal flourish extending to the right.

Walter T. Marlowe, P.E., CAE
Executive Director