



January 13, 2021

Col. Lance T. Frye, M.D.
Commissioner
Oklahoma Department of Health
1000 N.E. 10th Street
Oklahoma City, OK 73117

Dear Dr. Frye:

The Consumer Brands Association requests that the State of Oklahoma accelerate priority access to COVID-19 vaccines for Oklahoma's 11,200 frontline essential workers in the consumer packaged goods (CPG) industry.

On December 1, 2020, the Consumer Brands Association shared its request with the State of Oklahoma that the CPG industry's workers be included in Phase 1b, as outlined in the Centers for Disease Control and Prevention's (CDC) [COVID-19 Vaccination Program Interim Playbook](#). On December 22, 2020, the CDC published the Advisory Committee on Immunization's (ACIP) [Update Interim Recommendation for Allocation of COVID-19 Vaccine](#), which designated that Phase 1b include manufacturing and food workers. The ACIP recommendation made clear that Phase 1b includes individuals who are at increased risk of occupational exposure compared with other essential workers.

On January 12, 2021, the federal government announced that it will release more doses of the Pfizer and Moderna COVID-19 vaccines to states rather than hold them in reserve. Accordingly, Consumer Brands respectfully requests that the State of Oklahoma make necessary adjustments to its vaccination plan to protect the frontline essential workers making products indispensable to pandemic response, such as food, beverages, disinfectants, cleansers, hand sanitizer, toilet paper and personal hygiene products. As you are aware, the CPG industry is an integral part of Americans' ability to stay home and stay safe throughout the COVID-19 pandemic, populating key segments of our nation's critical infrastructure, as recognized by the Department of Homeland Security's Cybersecurity and Infrastructure Security Agency's (DHS-CISA) [Guidance for Tier 1 Type of Essential Critical Infrastructure Workers](#).

Despite an average COVID-19-related absentee rate of around 10%, the industry is meeting extraordinarily high demand as manufacturing facilities have remained open, with employees working around-the-clock to ensure that store shelves remain stocked. CPG facilities have been operating under emergency safety measures, based on federal and state guidance, with the understanding that essential critical infrastructure workers must conduct their work with great care. These measures follow tailored best practices to their facilities to prevent the exposure and transmission of COVID-19. The industry has carefully followed the evolving frontline worker guidelines published by the CDC, the Occupational Safety and Health Administration, the Food and Drug Administration and other federal agencies.

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From the beginning of the pandemic, the Consumer Brands Association has advocated to protect the industry's workers including priority access to personal protective equipment, critical hygiene and cleaning supplies, testing and vaccines. Unfortunately, community transmission of the virus remains one of the largest threats to the industry's workforce. An effective vaccination campaign may be the best defense against disruptions to the availability of the essential items that are critical to the wellbeing of the nation's first responders, health care personnel and professionals who will be administering vaccines.

Prioritization for Oklahoma's essential CPG workforce is a necessary defense measure to ensure that all frontline workers in each critical infrastructure sector are protected and remain healthy. We appreciate your service and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Michael Gruber', is written over a horizontal line.

Michael Gruber
Vice President, Regulatory and Government Affairs

cc: Keith Reed, RN MPH, Deputy Commissioner; Fauzia Khan, MD, Immunization Service Director