



January 27, 2021

Docket No. CDC-2021-0002
c/o Attn: January 25, 2021 ACIP Meeting
Centers for Disease Control and Prevention
1600 Clifton Road NE, Mailstop H24-8
Atlanta, GA 30329-4027

**Re: COVID-19 Vaccine Prioritization, Distribution and Administration;
CDC-2021-0002**

To Whom It May Concern:

On behalf of the food industry and the 12,000 supermarket pharmacies operated by our member companies, we at FMI – the Food Industry Association thank the Advisory Committee on Immunization Practices (ACIP) for its ongoing work to provide guidance to the Centers for Disease Control and Prevention (CDC) and the Department of Health and Human Services regarding the development, distribution and use of COVID-19 vaccines. The importance of the COVID-19 vaccine and a convenient, efficient, and safe delivery of the vaccine cannot be overstated.

As the food industry association, FMI works with and on behalf of the entire industry – from retailers who sell to consumers, to producers who supply the food and other products sold in grocery venues, as well as a variety of related critical services, including supermarket pharmacies – to advance safer and more efficient consumer supply chains for both food and pharmaceuticals. In total, FMI member companies operate roughly 33,000 grocery stores and 12,000 pharmacies, ultimately touching the lives of more than 100 million U.S. households on a weekly basis and representing an industry with nearly 6 million employees. Importantly, as part of an industry deemed essential to the nation’s COVID-19 response, FMI’s members have been and continue to be a critical component of ensuring the availability of food, pharmacy and health care services in communities across this nation, beginning in the initial days of the pandemic. www.fmi.org

FMI appreciates the opportunity to offer the following suggestions and feedback:

1. FMI strongly supports the ACIP’s recommendations to prioritize health care personnel, including pharmacists, in the initial phase of COVID-19 vaccine allocation as well as food and agriculture industry essential workers in Phase 1b.

However, to achieve consistent and equitable COVID-19 vaccination, the ACIP and CDC should strongly encourage states and immunization jurisdictions to adhere to the federal COVID-19 vaccine allocation recommendations. We appreciate the rigorous and scientific approach applied to the development of the federal guidelines, and state variation or divergence from those guidelines dilutes that work. While local application of national guidance may be appropriate, the CDC-ACIP should strongly encourage jurisdictions receiving allocations of COVID-19 vaccine to use and follow national prioritization guidance.

As a result of the uneven experience across state lines, with many states reworking their vaccine prioritization frameworks in the face of federal guidance, food industry essential workers – from manufacturing/production employees working in close proximity and grocery workers who have a higher contact rate with the public, to certain transportation workers and food safety auditors who ensure food, beverages, and packaged goods are safe for consumer consumption – are struggling to access vaccinations. Our industry's essential workforce has gone above and beyond in demonstrating their continued resilience, but to keep supply chains operating and Americans nourished until all can receive the vaccine, it is imperative these workers receive vaccinations. Furthermore, as supermarket pharmacies across the country are stepping up their support of national and state plans to provide vaccinations, modifications to federal prioritization guidelines across states are impeding efficiency in vaccine delivery, causing confusion and undermining the national COVID-19 vaccination effort.

With that in mind, FMI urges the Biden Administration to designate a Federal Coronavirus Vaccine Coordinator in each state and jurisdiction to coordinate at all levels of government and to help ensure the rapid, efficient deployment of vaccines among priority populations. Separately, to the extent that jurisdictions have already made revisions to federal COVID-19 vaccine allocation guidance, FMI respectfully requests that the CDC compile and store all such state guidance so the information is easily accessible by all stakeholders.

2. FMI member companies operate roughly 12,000 supermarket pharmacies nationwide, with pharmacists providing in-depth patient counseling and comprehensive immunization services. Supermarket pharmacies administered roughly 25% of the nation's influenza vaccinations last year, and now they stand ready to play an expanded role in increasing access to COVID-19 vaccinations. A number of FMI pharmacy members have been providing COVID-19 vaccinations via the federal pharmacy partnerships and a majority of our pharmacy members

are enrolled as providers in the states where they operate. All these companies have pharmacists prepared to administer COVID-19 vaccinations in their stores and many have pharmacists available and ready to provide vaccinations off-site as well. Additionally, many of our members are utilizing their parking lots and outdoor tent-covered areas as COVID-19 vaccination clinics capable of administering nearly 1,000 shots per day. However, our members are not yet receiving vaccine supplies equal to their capacity.

Serving as knowledgeable and trusted wellness partners within their communities, supermarket pharmacies are essential to any successful COVID-19 vaccination plan. Consumers' ability to receive a COVID-19 vaccination at the same location where they already purchase food and other essential items is not only a convenience, it also is safer and reduces the risk of exposure in the midst of a pandemic. In addition to having large footprints and parking lots that allow social distancing, many FMI pharmacy members have additional/extended store hours to provide times for seniors and immunocompromised patients to receive vaccinations. Also, being such trusted health care providers, supermarket pharmacists could play a key role in addressing patient concerns and highlighting the importance of being vaccinated. FMI members are utilizing the CDC toolkits for these communications.

3. In order for vaccine providers and healthcare professionals to fully utilize the limited supply of vaccines they receive, they must have visibility into the expected availability of future doses. To expedite vaccinations, FMI respectfully requests the federal government share with states and providers, the anticipated lot release dates for vaccine doses.

Mass administration of vaccines requires significant staff resources and logistics coordination. Currently, FMI pharmacy members lack transparency into the number of doses that will be available and the timing on their availability. This makes planning and communicating with patients about vaccination scheduling very difficult. Additionally, both the Pfizer and Moderna vaccines require the administration of two doses for the vaccines to be fully effective in protecting individuals from COVID-19. In order for providers to administer an initial dose of these vaccines, they must have confidence that sufficient supply will be available to administer the second dose, based on the timing indicated in the Food and Drug Administration's emergency use authorizations. Sharing anticipated lot release dates from manufacturers would give providers more clarity as they plan mass administration efforts and greater confidence that second doses will be available when their patients need them.

Again, FMI thanks the ACIP for the opportunity to provide input on this critically important initiative. If you have questions about these comments or would like additional information, please feel free to contact me or Peter Matz at pmatz@fmi.org or (202) 452-8444.

Sincerely,

A handwritten signature in black ink that reads "Leslie G. Sarasin". The signature is written in a cursive style with a large, prominent initial "L".

Leslie G. Sarasin
President and CEO