

December 11, 2020

Dr. Moncef Slaoui, Chief Advisor General Gustave F. Perna, Chief Operating Officer Operation Warp Speed U.S. Department of Health and Human Services 200 Independence Avenue SW Washington, DC 20201

Dear Dr. Slaoui and General Perna:

As the association of local governments in the metropolitan Washington region, we applaud the efforts to expeditiously develop and distribute a safe, effective vaccine for COVID-19. As we prepare for a large-scale distribution, we acknowledge the logistical challenges presented by the need to vaccinate millions of citizens in our multi-jurisdictional metro area. Clearly, prioritization of our most at risk populations is required and we are supportive of both the CDC's Advisory Committee on Immunization Practices recommendations for vaccine distribution as well as the strategies described by the State of Maryland, Commonwealth of Virginia, and District of Columbia which mirror CDC's guidance. However, we believe the proposed formula for vaccine distribution utilizing residential population does not best accomplish the objectives of protecting significant portions of our healthcare workforce and the patients they serve.

The health systems of our region are intertwined in a manner that provides for a comprehensive network of care. In jurisdictions where large numbers of healthcare positions are concentrated, workers frequently reside in surrounding jurisdictions. For example, the District of Columbia hosts more than 80,000 healthcare positions and approximately 75 percent of that workforce resides in Maryland and Virginia.

A distribution strategy based solely on residential population does not address those who cross state boundaries for work. If vaccines are administered through work sites, as is proposed, fewer healthcare employees working in the District of Columbia will receive vaccines in the earliest phases of the vaccination program than in any other area of the country. This is disproportionately harmful to the healthcare workers who live in the District of Columbia, Maryland, and Virginia. A distribution strategy that prioritizes healthcare workers while simultaneously supplying vaccine doses based on population data will result in large gaps in healthcare industry vaccinations in our region, including frontline workers such as Emergency Room and Intensive Care Unit staff.

We request the formula for distribution of available vaccines consider the realities of our connected region. Our residents commonly use and work at hospitals and other healthcare facilities in adjacent jurisdictions. We ask that vaccine allocations, particularly the allotments for the District of Columbia, align with the concentration of healthcare workers that are employed in the jurisdiction. This modification of the distribution formula would help us achieve our shared goal of vaccinating our most at-risk populations more efficiently.

We are prepared to work together to ensure vaccine distribution in the region achieves our common objectives. We ask for your consideration of our request and, where required, the flexibility to adopt a vaccine formula and distribution strategy that supports our region's needs.

Sincerely,

Derrick L. Davis Chair, Board of Directors

Prince George's County

Christian Dorsey Vice Chair, Board of Directors

Arlington County

Robert C. White, Jr. Vice Chair, Board of Directors

District of Columbia

cc: Regional Congressional Delegation