



December 16, 2020

*Sent via email to [ACIP@cdc.gov](mailto:ACIP@cdc.gov)  
Submitted via [www.regulations.gov](http://www.regulations.gov)*

**RE: Docket CDC-2020-0124**

Dr. José R. Romero, MD, FAAP  
Chair, Advisory Committee on Immunization Practices  
Centers for Disease Control and Prevention  
1600 Clifton Road, NE  
Atlanta, GA 30329-4027

Dear Chairman Romero and Members of the Advisory Committee:

The health and safety of employees, customers and communities continue to be top priorities for the nation's retailers. On behalf of the members of the National Retail Federation, we appreciate the opportunity to submit comments to the Advisory Committee on Immunization Practices (ACIP). The ACIP's official recommendations on the prioritization of groups for early COVID-19 vaccination is of paramount interest to our members.

NRF agrees with the ACIP's interim guidance and assessment that health care personnel and residents of long-term care facilities receive the vaccine in this initial phase<sup>1</sup>. We respectfully request that ACIP consider the importance, and interconnected nature, of the retail industry as it weighs the proper distribution of limited supplies of vaccines approved for use to prevent an infection of COVID-19. We strongly believe retail workers should be prioritized and included during Phase 1(b).

Retail is a fundamental part of the daily lives of American consumers, providing a variety of goods for sale through a multitude of channels — via stores, online, curbside pickup, buy online, pick up in store, and delivery to almost any location. In total, the retail industry directly employs 32 million American workers. Retailers have invested billions of dollars to keep employees and customers safe, spending on protective gear, store redesigns, employee health screens and numerous other COVID-19 prevention protocols. These effective safety measures are likely to remain in place even after the vaccinated population increases.

Retail is heavily reliant upon people, technology, stores, distribution facilities, transportation, payment systems, warehouses, ports, delivery drivers, and logistics. Retailers also include a

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<sup>1</sup> <https://www.cdc.gov/mmwr/volumes/69/wr/pdfs/mm6949e1-H.pdf>

community's quick service, fast casual and family dining restaurants. Every day, front-line retail employees in stores, distribution centers, restaurants and delivery services work to keep people safe. They have swiftly adapted new health and safety protocols developed by retailers and the CDC during a constantly changing workplace environment. Many workers who were furloughed and unable to work during the early months of the pandemic were only recently able to resume their careers before the latest shutdown orders took effect. We believe workers on the front lines of safely serving their communities, who have faced multiple stoppages and lost paychecks, should be able to access safe COVID-19 vaccines during the early stages of its distribution.

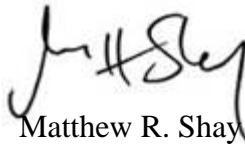
Retailers can also assist the CDC and state public health professionals in safely distributing the vaccine to the greater population at the appropriate time. Through our efficient supply chains and vast network of physical store locations, retailers can facilitate community vaccination efforts. Our members can share information on where to learn more about the importance of these vaccines with their customers. When the time comes, retailers can help keep healthy individuals approved to receive the vaccine away from hospitals, medical centers and clinics by hosting vaccination centers on store property. Distribution of vaccines on retail premises — whether in stores, in parking lots or at distribution centers — will keep members of the public from gathering in great numbers at any one location. These efforts can also facilitate the vaccination of greater numbers of the retail workforce. Moreover, strong acceptance of vaccinations by the diverse retail workforce can assist in positive behavioral modeling for the entire society.

The coronavirus, and the ensuing shutdown of businesses, has wrought havoc upon retailers of every size, in every community. The process of approving vaccines for use to combat COVID-19, and appropriate ordering of its distribution, is a critical first step in getting our economy and community life back on track. Given the size of the U.S. retail workforce and importance in supporting individuals, households and families across the country, we believe the ACIP should place a significant emphasis on these workers as soon as practical.

This is a crisis unlike any we have seen in our lifetime, and we appreciate all that you are doing to keep our communities safe and healthy. Should you have any questions or require additional information, please contact both David French ([frenchd@nrf.com](mailto:frenchd@nrf.com)) and Jason Straczewski ([straczewskij@nrf.com](mailto:straczewskij@nrf.com)) at the National Retail Federation.

Thank you for your attention to these concerns. The National Retail Federation stands ready to assist as you consider how best to safely and efficiently distribute vaccines to prevent COVID-19 infections.

Sincerely,



Matthew R. Shay  
President & CEO