



December 7, 2020

Jill Huntsaker Ryan
Executive Director
Colorado Dept. of Public Health & Environment
4300 Cherry Creek Drive South
Denver, CO 80246

Dear Executive Director Ryan,

On behalf of the Colorado BioScience Association (CBSA) and our members, thank you for your leadership during this crisis. The public health challenges facing our country and our state are unprecedented, and we appreciate the steps you and your department have taken to keep individuals and communities in Colorado safe.

CBSA commends the state's Joint Vaccine Planning Team for their work to develop a vaccine allocation plan that is fair, transparent and equitable. We support the framework that was submitted to the CDC based on the principles of equity, reduction of death and disease burden, maintaining societal function and cohesion, protecting the continuing function of essential services, reciprocity, multiplier effect, legitimacy, and transparency. However, as we move closer to the approval of a COVID-19 vaccine and the state works to finalize its plan, we want to point out several critical functions within the life sciences workforce to ensure they are considered in this process. We appreciate your feedback and guidance on the appropriate vaccine allocation phases for these essential workers.

Within the life sciences industry, clinical field personnel of the medical device sector perform critical functions alongside health care professionals on the front lines of this crisis. These workers, also known as Health Care Industry Representatives or HCIRs, are often required to be present in patient care settings to provide technical support concerning the safe and effective application of surgical products and technologies.¹ For instance, they may be involved in the remote calibration or adjustment of medical devices to meet the specifications of a surgeon or a manufacturer.² The participation of HCIRs is vital to ensuring continuity of patient care throughout the health care system. As a result of their role alongside health care professionals, HCIRs have a high-risk of exposure to COVID-19. As you evaluate and develop recommendations for vaccine allocation, we wanted to make sure you are aware of these representatives. We ask that you consider their role in patient care when determining eligibility requirements for each phase of allocation.

We also respectfully ask for guidance and confirmation on the vaccine allocation phase for essential workers in the life sciences, which includes those involved in the research and development, manufacturing, and distribution of prescription drugs, devices, and diagnostics.

¹ See Association of periOperative Registered Nurses (AORN), Position Statement on the Role of the Health Care Industry Representative in Perioperative Settings, May 28, 2020, available at <https://aornjournal.onlinelibrary.wiley.com/doi/full/10.1002/aorn.13065>.

² American College of Surgeons (ACS). Revised Statement on Health Care Industry Representatives in the Operating Room, October 1, 2016, available at <https://www.facs.org/about-ac/s/statements/91-industry-reps-in-or>.

These workers perform critical functions to maintain the medical supply chain and ensure treatments and technologies remain accessible to those who need them. We ask that you consider including them in Phase 2A of the vaccine allocation plan, along with other essential workers.

Please do not hesitate to contact us if you have any questions. We would welcome the opportunity to discuss these issues in greater detail.

Thank you for your consideration.

Sincerely,



Jennifer Jones Paton
President & CEO
Colorado BioScience Association



Emily Roberts
Vice President
Colorado BioScience Association