



March 2, 2021

The Honorable Joseph R. Biden
President of the United States
The White House
Washington DC 20500

Dear President Biden:

On behalf of the nation's large employers, Business Group on Health thanks you and your administration for your leadership in response to the COVID-19 pandemic and your commitment to improving America's health care system. The Business Group represents [431 primarily large employers](#), including 74 of the Fortune 100, who voluntarily provide health, leave, disability, and other benefits to over 55 million American employees, retirees, and their families. As employers and employees continue to respond to the unprecedented public health and economic conditions of COVID-19, ensuring access to COVID-19 vaccines and safe workplaces will be critical to the nation's recovery.

Business Group members—who have committed to providing affordable, comprehensive health coverage to their employees—have resources that may put them in a unique position to promote and assist vaccination efforts for their employees and their communities. However, the unprecedented public health and economic conditions of COVID-19 require that all stakeholders in the health care system, public and private, work together to ensure the health of the workforce and a safe return to the workplace. We urge your administration to continue its support for working families by:

- Incorporating large employers' insights, resources, and capabilities into the national vaccination strategy;
- Establishing and enforcing uniform, national standards for vaccine priority, distribution, and administration; and
- Building and funding a public health infrastructure that supports employees' long-term health and return to the workplace.

We detail our recommendations below.

I. Large Employers' Potential Role in Vaccination

Business Group members operate in all 50 states, and many have an interest in using their resources to assist COVID-19 vaccination efforts in their communities. These resources include but are not limited to the following:

- **Communications teams.** Large employers often have internal communications teams with extensive experience delivering information to employees on a range of topics, including workplace safety and health coverage. These teams could develop strategies to address vaccine hesitancy and COVID-19 precautions such as mask wearing and tailor communications to the language(s) and local conditions of specific employee populations.
- **Vaccine incentives.** Employers may be able to offer incentives, financial or otherwise, to employees to be vaccinated. While most employers currently do not offer incentives, some may consider doing so once vaccines are widely available and receive full FDA approval.
- **Health coverage.** Most large employers offer comprehensive health coverage to employees. For employees maintaining this coverage, existing provider networks, reimbursement processes, and communications capabilities can substantially ease the process for employees and their families to schedule and obtain vaccines.
- **Scheduling.** Large employers have the ability to schedule times during the workday for employees to be vaccinated. Employers also may offer paid or unpaid time off for vaccinations.
- **Onsite clinics.** Many large employers have onsite or near-site clinics and staff that provide health services to employees. When vaccine supplies become more widely available, these clinics may play a role in vaccination efforts—similar to existing employer-sponsored flu vaccination programs.
- **Space.** Many large employers have space such as office buildings, retail locations, and parking lots in all 50 states. Some may be uniquely positioned to make space available for vaccination efforts.

We believe that incorporating employers' experience and resources into the national vaccination strategy will speed vaccination efforts for working families and their communities. We therefore encourage your administration and federal agencies to communicate and coordinate with large employers as the COVID-19 vaccine becomes more widely available.

II. Vaccine Priority, Distribution, and Administration

Many Business Group members operate in essential industries such as health care, transportation, food, and agriculture. As state and municipal entities have begun vaccination efforts for employees in these critical sectors, employees have encountered inconsistent messaging about vaccine priority, difficulty scheduling vaccinations, and confusion about the location of vaccination sites. A single multistate employer may have to monitor dozens of state and local vaccination priority and scheduling systems in attempts to determine whether employees and their workplaces are safe. It is clear to our members that a more unified, efficient vaccination system is critical to employees' health and safe return to the workplace. We therefore recommend that the administration and federal agencies establish and enforce uniform, national standards for vaccine priority and distribution, including:

- A requirement that information on vaccine supply be public and transparent so employers can anticipate vaccine availability for workforces;
- Standards for the documentation or attestation required to demonstrate vaccine eligibility, if any;
- Standardized, accessible tools for appointment scheduling and tracing second doses;
- Processes that include vaccine distribution through lab service providers, in addition to pharmacies and health care providers;
- Clear guidance on employers' role in vaccination, if any, and a clear timeline for when they will be able to fulfill this role;
- Uniform procedures for employers to register their on-site or near-site clinics as vaccination sites, including safety requirements for these sites;
- For employers involved in vaccination, model documents with vaccine information that employers should distribute upon vaccination; and
- Alternative procedures for individuals without internet or email access to schedule and obtain vaccines.

We also urge the administration and Congress to support and fund a more robust, national public health surveillance infrastructure to mitigate the current and any future pandemics.

III. Guidance for Worksites and Employees

In addition to an efficient, accessible vaccination system, employers also will need clear public health and regulatory guidance that addresses pandemic conditions. Employers and employees would benefit from guidance on the following:

- Best practices for workplace testing, contact tracing, and isolation/quarantine that can be adapted to different industries;
- How employers should coordinate with public health authorities regarding testing, contact tracing, COVID-19 diagnoses, and vaccinations;
- When and under what conditions employers can provide incentives or require vaccinations for employees;
- Employers' privacy and confidentiality obligations with regard to testing, contact tracing, COVID-19 diagnoses, and vaccinations; and
- Communications that can be tailored to different populations regarding different available vaccines and vaccination processes.

We strongly recommend that agencies with regulatory authority—such as the CDC, EEOC, OSHA, and others—coordinate to ensure clear, consistent guidance for employers and employees. We also suggest that in issuing guidance, agencies adopt a reasonable good faith compliance standard, which would focus on adoption and implementation of best practices rather than assessment of penalties.

Thank you for considering our recommendations. We would be happy to provide additional details and look forward to continuing work with the administration and federal agencies to support employers and employees through the COVID-19 pandemic. Please feel free to contact me to discuss (kelsay@businessgrouphealth.org).

Sincerely,



Ellen Kelsay
President & CEO