



Advisory Committee on Immunization Practices  
Centers for Disease Control and Prevention  
1600 Clifton Road NE  
MS H24-8  
Atlanta, GA 30329-4027

December 11, 2020

**Re: Prioritizing Distribution of the COVID-19 Vaccine for Essential Pest Control Workers**

Dear Advisory Committee on Immunization Practices:

Thank you for your commitment to protecting public health, defeating COVID-19, and working hard to distribute vital vaccines to the American people. The National Pest Management Association (NPMA) and our 5,500 structural pest control member companies support the Centers for Disease Control's Advisory Committee on Immunization Practices (ACIP) recent recommendation of administering the voluntary COVID-19 vaccine first to health care workers and specific other high-risk individuals in Phase 1a. Once these individuals are vaccinated, other essential workers like pest control technicians must be prioritized in Phase 1b so that they can continue to protect our food after it leaves the farm, hospitals and intensive care units from dangerous and deadly pests, and countless other places where pests jeopardize human health.

Earlier this year, the Cybersecurity & Infrastructure Security Agency (CISA) identified structural pest control services as a critical infrastructure sector, under 1. Food and Agriculture, and 2. Public Works and Infrastructure Support Services.<sup>1</sup> Amid the COVID-19 pandemic, the professional structural pest control industry continues to provide essential services to the nation's food production facilities, grocery stores, restaurants, food banks, shelters, hospitals, medical institutions, nursing homes, multifamily housing units, schools, universities, prisons, warehouses, homes, and businesses. We cannot afford to have our medical facilities, grocery stores, or homes uninhabitable due to pests and pest-related diseases.

The pest control labor force has been tested over the past year, as employees have become infected. A single infected employee requires that our member companies quarantine additional employees with whom he or she may have been in contact. This situation potentially leaves essential positions unfilled, extra hours for non-infected employees, and delaying vital pest control services for homes, hospitals, and businesses. The sidelined labor force could very easily result in

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<sup>1</sup>[https://www.cisa.gov/sites/default/files/publications/Version\\_4.0\\_CISA\\_Guidance\\_on\\_Essential\\_Critical\\_Infrastructure\\_Workers\\_FINAL%20AUG%2018v3.pdf](https://www.cisa.gov/sites/default/files/publications/Version_4.0_CISA_Guidance_on_Essential_Critical_Infrastructure_Workers_FINAL%20AUG%2018v3.pdf)

contaminated food, a disrupted food supply chain, and out of commission precious hospital space and ICU beds as a result of a pest infestation.

You may have read in the news that rodents have adapted their feeding behavior and are more aggressive during the pandemic due to the altered lifestyle of humans.<sup>2</sup> Additionally, bed bug infestations continue to occur in hospitals and ICU units, as they always have<sup>3</sup>, but now are overcrowded with COVID patients. There is not a segment of the food or medical industry that could comply with federal sanitation and health regulations without an adequate pest control program.

The approximately 120,000 men and women who have answered the call to provide their essential service of structural pest control should be prioritized to receive the voluntary COVID-19 vaccine during Phase 1b after health care personnel and other high-risk individuals are vaccinated. Thank you for your time and consideration. We look forward to providing our essential pest control services and working with you to ensure a smooth vaccination distribution rollout.

Sincerely,



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<sup>2</sup> [https://www.cdc.gov/coronavirus/2019-ncov/php/rodents.html?CDC\\_AA\\_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fcommunity%2Frodents.html](https://www.cdc.gov/coronavirus/2019-ncov/php/rodents.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fcommunity%2Frodents.html)

<sup>3</sup> <https://ucanr.edu/sites/practice/files/268461.pdf>

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