



December 16, 2020

COVID-19 Expert Vaccine Allocation Panel
Texas Department of State Health Services
PO Box 149347
Austin, Texas 78714-9347

Distinguished Members of the COVID-19 Expert Vaccine Allocation Panel,

We first want to thank you for your time and dedication to our great state during this health care crisis. The work your panel is tasked with is critical in how our state moves forward from this pandemic.

On behalf of a coalition of emergency care physicians, emergency nurses, providers, professionals, and associations in Texas, we write to express our deep concern with the COVID-19 Vaccine Allocation Tier levels and the exclusion of emergency medicine personnel in Tier 1. We urge you to include all emergency medicine personnel into Tier 1, including those providers who choose to work at independently licensed emergency care facilities.

Sound public policy would seem to demand categorizing Texas healthcare personnel according to their job functions rather than by facility type or who might own the facility. However, while some emergency medical personnel are categorized in Tier 1, others are not. This policy discrepancy will leave thousands of frontline emergency medicine personnel who do not work in a hospital setting extremely vulnerable across the state.

Emergency medicine personnel are the exact frontline workers your plan aims to protect. They align with the Expert Vaccine Allocation Panel's Guiding Principles of Vaccine Allocation in a number of ways. They work in licensed facilities that are open 24/7 and are bound by state and federal law to see every patient who walks through the door. Furthermore, several independently licensed emergency care facilities are now enrolled in CMS and are seeing an increasing number of elderly and vulnerable Texans around the state, making early access to vaccines even more pressing. If the federal government sees the significance these facilities are playing during this pandemic, it makes sense that our state would as well.

The Centers for Disease Control recommends all healthcare personnel be offered the vaccine in the initial phase of the COVID-19 vaccination program. We understand Texas' first allotment of


vaccines is limited and that you are working to make it equitable for all. We share the same goal, to ensure the health and wellbeing of all Texans. That is why it is critical that all emergency medicine personnel, no matter the facility type or who owns it, be included in Tier 1.

COVID-19 has illustrated the pillar role played by emergency medical personnel in the Texas healthcare system. Emergency personnel took the lead in the early stages of the medical response to the pandemic, becoming the first port of call for suspected cases, all the while maintaining their regular activity. The work done by these professionals, who in the hour of need delivered care to those affected regardless of the exposure risks, gave time for the rest of the healthcare system to prepare. They have continued to work long hours, taken on more shifts, intubated patients, taken extreme measures to protect their own loved ones, fallen ill, and some have even lost their lives. All in the pursuit of saving lives. It is time our state prioritizes their lives as well.

Thank you for your support of the emergency medicine community and attention to this urgent matter.

Sincerely,

Robert J Hancock, DO FACEP
TCEP President



Lisa Moreno-Walton, MD
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Kevin Herrington, MBA, FACHE
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CC:

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DSHS Commissioner John Hellerstedt, MD
HHSC Executive Commissioner Cecile Young
Lieutenant Governor of Texas Dan Patrick
Texas House Speaker-Elect Dade Phelan
Senate Health and Human Services Committee Chair Lois Kolkhorst
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