GUIDANCE SUMMARY

WA STATE COVID-19 VACCINE PRIORITIZATION GUIDANCE
AND ALLOCATION FRAMEWORK

The Washington State Department of Health has developed this guidance for COVID-19 vaccine allocation and prioritization to facilitate harmonized planning for distribution across Washington State. This guidance is the result of several months of engagement with expert groups and community partners to gather input and ideas. Given current information and federal guidance, we are providing guidance on Phases 1 through 4 that incorporates this input while staying aligned with the principles and criteria noted below. The guidance has and can continue to be updated based on:

- New information from clinical trials
- New federal guidance and vaccine recommendations
- Ongoing feedback from impacted communities, partners, sectors, and industries

In this guidance, population groups overlap and there are individuals who fit into multiple categories. When this is the case, the higher phase should take precedence. Also, the order of the populations does not suggest any type of prioritization or risk stratification. In all circumstances, although reinfection appears uncommon during the initial 90 days after symptom onset, prior confirmation of COVID-19 infection will not exclude any individual from eligibility for COVID-19 vaccine and serologic testing is not being recommended prior to vaccination. Vaccines should be administered according to age groups for which the specific vaccine is authorized (e.g., Pfizer for 16 and over and Moderna for 18 and over).

GOAL: To reduce severe morbidity and mortality and negative societal impact due to the transmission of SARS-CoV-2

ETHICAL PRINCIPLES
- Maximum benefit
- Equal concern
- Mitigation of health inequities

PROCEDURAL PRINCIPLES
- Fairness
- Transparency
- Evidence-based

CRITERIA
- Risk of acquiring infection
- Risk of severe morbidity and mortality
- Risk of negative societal impact
- Risk of transmitting infection to others
Phase Eligibility Timing

The table below outlines groups who are currently eligible vs. projected timing for future eligible groups. These future plans are tentative and are subject to change depending upon vaccine supply and demand.

<table>
<thead>
<tr>
<th>Phase</th>
<th>When it will open</th>
<th>Who is in it</th>
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<tbody>
<tr>
<td>1A</td>
<td>Currently open (Dec 14, 2020)</td>
<td>• See prioritization guidance</td>
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| 1B tier 1 | Currently open (Jan. 18, 2021) | • See prioritization guidance  
• Pre-kindergarten through 12th grade educators and staff *(added March 2)*  
• Child care staff *(added March 2)* |
| 1B tier 2 | Currently open (March 17, 2021) | • High-risk critical workers in certain congregate settings  
• People age 16 or older who are pregnant  
• People age 16 or older who have a disability that puts them at higher risk |
| 1B tier 3 & 4 | Currently open (March 31, 2021) | • People 16 years or older with 2 or more comorbidities or underlying conditions  
• People 60 years and older  
• People, staff and volunteers in certain congregate living settings – specifically, correctional facilities, congregate settings where people experiencing homelessness live or access services, and group homes for people with disabilities  
• Other at-risk critical workers in certain congregate settings – specifically, restaurants/food services, manufacturing, and construction |
| 2, 3   | Opens April 15, 2021 | • All people age 16 years and older not already covered |

Phase 1a - Tier 1

Overarching Groups:

• **High-risk workers in health care settings** (clinical judgment should be applied to identify who is at greatest risk using the guidance below)  
• **High-risk first responders** (clinical judgment should be applied to identify who is at greatest risk using the guidance below)  
• **Residents and staff of nursing homes, assisted living facilities, and other community-based, congregate living settings where most individuals over 65 years of age are receiving care, supervision, or assistance**

Phase 1a focuses on (a) high-risk workers in health care settings and high-risk first responders in order to protect our medical care response capacity and (b) residents and staff of nursing homes, assisted living facilities, and other community-based, congregate living settings where most individuals over 65
years of age are receiving care, supervision, or assistance aiming to avoid hospitalizations, severe morbidity, and mortality. The table below identifies the desired objectives and guidance regarding what individuals would be prioritized for vaccine allocation in this phase. We provided recommendations that closely align with the Advisory Committee on Immunization Practices (ACIP) and initially include risk stratification given limited vaccine.

CDC provided initial COVID-19 vaccine supply projections for the first two months. Assuming Washington state receives approximately 2 percent of the total projections (Washington’s approximate proportion of total U.S. population), our state was expected to receive between 150,000 to 350,000 doses in the first month and between 500,000 to 1 million doses in the second month (inclusive of second doses). Also note that many residents of long-term care facilities will be served via a federal pharmacy program that began in late December and draws down from the Washington state vaccine allotment. Given limited vaccine, sub-prioritization and sequencing of distribution to health care personnel was initially necessary. Furthermore, agencies have been encouraged to consider staggering vaccine schedules of teams to avoid potential clustering of worker absenteeism related to systemic reactions.

Beyond ACIP, this guidance was developed based on input and review by a number of experts including Washington advisory groups (Vaccine Advisory Committee, Disaster Medical Advisory Committee, COVID-19 Science Advisory Working Group, Association for Professionals in Infection Control), health care providers, and local health jurisdictions (including health officers).

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<tr>
<th>PHASE 1A-1 OBJECTIVE</th>
<th>PHASE 1A-1 GUIDANCE</th>
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| **To protect those at highest risk of exposure, to maintain a functioning health system, and to protect highly vulnerable populations** | **In the context of limited vaccine, this guidance includes the following sub-prioritization considerations:**  
  
  - Personnel without known infection in prior 90 days  
  - Workers in sites where direct patient care is being frequently delivered to confirmed or suspected COVID-19 patients, including sites where suspected patients are directed for COVID testing and care  
    - Example setting: hospital sites managing suspected/confirmed COVID patients; emergency departments; urgent care; clinics (walk-in, respiratory); home; isolation and quarantine facility  
    - Examples types of workers: health care workers; technicians; security; environmental, janitorial, and facility staff; non-remote translators; counselors; home health aides, caregivers, and companions  
  - Workers frequently performing high-risk exposure procedures with suspected or confirmed COVID-19 patients  
    - Example procedures: endotracheal or cough inducing intubation; cough induction or cough inducing procedure (e.g., nasogastric tube); bronchoscopy; suctioning; turning the patient to the prone position; disconnecting the patient from a ventilator; invasive dental procedures and exams; autopsies; respiratory specimen collection; cardiopulmonary resuscitation; upper endoscopy; laparoscopic surgery; placement of chest tubes for pneumothorax  
  - Workers exposed to/handling potentially SARS-CoV-2 containing specimens  
  - COVID-19 testing site staff at high risk of exposure to suspected COVID-19 patients  
  - First responders at high risk of exposure to suspected or confirmed COVID-19 patients via high public exposure and procedures  
    - Licensed emergency medical service frontline staff regardless of agency (e.g., fire, ambulance, hospital)  
    - Emergency workers providing patient transport/ambulatory support regardless of agency  
    - Personnel working in the field to provide oversight of these emergency medical service positions  
  - Workers with elevated risk of acquisition/transmission with populations at higher risk of mortality or severe morbidity |
Workers at long-term care facilities and other community-based, congregate living settings where most individuals over 65 years of age are receiving care, supervision, or assistance (e.g., healthcare, environmental facility management, counselors, dining staff, etc.)

- Home health aides, care aides, caregivers (paid or unpaid), companions, etc.
- Workers with patients undergoing chemotherapy, chronic renal disease, dialysis, etc.

- Workers (including pharmacists and occupational health staff) administering vaccines to Phase 1a and 1b populations

Residents and staff of long-term care facilities and other community-based, congregate living settings where most individuals over 65 years of age are receiving care, supervision, or assistance and are unable to reside independently in the community:

- Example: skilled nursing facilities – facility engaged primarily in providing skilled nursing care and rehabilitation services for residents who require care because of injury, disability, or illness
- Example: assisted living facilities – facility providing help with activities of daily living; residents often live in their own room or apartment within building/group of buildings
- Examples of possible settings: adult family homes; group homes for people with disabilities (physical, developmental, intellectual); mental/behavioral health institutions; residential homeless shelters

Where sub-prioritization is needed, consider:

- Skilled nursing facilities caring for the most medically vulnerable residents and of congregate nature so they face the joint risk factors of severe disease/mortality and transmission due to their living settings
- After skilled nursing facilities, consider broadening to other facilities, including:
  - Assisted living facilities and adult family homes
  - Residential care communities
  - HUD 202 low-income senior housing
  - Intermediate care facilities for individuals with developmental disabilities
  - State Veterans Homes

Phase 1a (Tier 1) Additional Guidance

- We specifically use the terminology “workers in health care settings” and not “health care workers” because health agencies should consider the full spectrum of workers who might fit these conditions. Health care agencies should consider all types of staff (e.g., contracted, part-time, unpaid/volunteer) and the spectrum of staff who provide services (e.g., ambulatory, direct patient care, support services). ACIP provides similar guidance regarding defining healthcare personnel.¹

- Specifically, for caregivers: eligible caregivers (licensed, unlicensed, paid, unpaid, formal, or informal) who support the daily, functional and health needs of another individual who is at high risk for COVID-19 illness due to advanced age, long-term physical condition, co-morbidities, or development or intellectual disability. For the caregiver to be eligible, the care recipient:
  - Must be someone who needs caregiving support for their daily, functioning, and health needs
  - Can be an adult or minor child. For dependent minor children, the caregiver is eligible if that child has an underlying health condition or disability that puts them at high risk for severe COVID-19 illness. For example: a caregiver of a minor child with Down syndrome.
Special attention should be paid to workers in health care settings who are at high risk of exposure and may have inconsistent or limited use of PPE as well as those working in settings with inadequate environmental controls for recommended air exchange.

Phase 1a - Tier 2 (after completion of Tier 1)

Overarching Group:

- All other workers at risk in health care settings

The definition of health care settings as defined by the CDC refers to places where health care is delivered and includes, but is not limited to, acute care facilities, long term acute care facilities, inpatient rehabilitation facilities, nursing homes and assisted living facilities, home healthcare, vehicles where healthcare is delivered (e.g., mobile clinics), and outpatient facilities, such as dialysis centers, physician offices, and others.

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<th>PHASE 1A-2 OBJECTIVE</th>
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| To protect those at highest risk of exposure, to maintain a functioning health system, and to protect highly vulnerable populations | All other workers at risk to COVID working in health care settings  
- Workers who are at risk of acquisition or transmission of COVID because they are interacting in close proximity (less than 6 feet) with patients, co-workers, or specimens and are unable to remain socially distant (i.e., not include remote workers) |

Phase 1a (Tier 2) Additional Guidance

- We specifically use the terminology “workers in health care settings” and not “health care workers” because health agencies should consider the full spectrum of workers who might fit these conditions. Health care agencies should consider all types of staff (e.g., contracted, part-time, unpaid/volunteer) and the spectrum of staff who provide services (e.g., ambulatory, direct patient care, support services).
- Across Washington, it is important that health care systems actively reach out to and provide access to COVID-19 vaccination for community-based health care workforce outside their systems and in their community. This includes other health care providers, school nurses, and behavioral health providers, etc., in order to compete this phase and ensure we have a protected healthcare system.

Phase 1b

Phase 1b phase includes people who are high to moderate risk against the four risk criteria listed below stratified in different tiers given limited vaccine supply:

- Risk of acquiring infection
- Risk of severe morbidity and mortality
- Risk of negative societal impact
• Risk of transmission to others

In addition, we have applied equity as a cross-cutting lens and considered situations when certain groups are disproportionately affected due to social factors and/or other systemic inequities to mitigate for these factors.

**Phase 1b - Tier 1**

**Overarching Groups:**

- All people 65 years and older
- People 50 years and older in multi-generational households
- Workers in childcare settings
- Pre-kindergarten-12th grade educators and staff

The first two objectives of this tier focus on protecting those who are driving hospitalization and face high rates of severe morbidity and mortality in order to reduce the burden on hospitals that keeps us in an emergency state. We also want to recognize that there are older adults and elders who may be vulnerable and unable to live independently similar to those in community-based, congregate care settings (Phase 1a) but their families care for them at home. In addition, we recognize that many families - especially those disproportionately affected by COVID - live in multi-generational homes that put the older adults and elders in the household at significantly higher risk for acquiring infection. Because these individuals are among disproportionately affected groups, they are also at risk for higher rates of severe morbidity and mortality.

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<th><strong>PHASE 1B-1 OBJECTIVE</strong></th>
<th><strong>PHASE 1B-1 GUIDANCE</strong></th>
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<tbody>
<tr>
<td>To prevent hospitalization and rates of severe morbidity and mortality</td>
<td>All people 65 years and older (about half of whom have co-morbidities that increase risk for severe outcomes if infected with COVID)</td>
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<tr>
<td>To prevent acquiring infection, hospitalization, and rates of severe morbidity and mortality</td>
<td>People 50 years and older in a multigenerational (2 or more generations) household</td>
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These individuals would be at risk either due to:

- Vulnerability – specifically, an older adult or elder who cannot live independently and is being cared for by a relative or in-home caregiver or being cared for by someone who works outside the home
- Risk of exposure – specifically, an older adult or elder who is living with and taking care of kinship (along the lines of a grandparent with a grandchild)
- This group does not include an older adult who is able to live independently and is taking care of the individual’s kinship/children

On March 2, 2021, Gov. Jay Inslee and the Washington State Department of Health in accordance with a federal directive added another group to this tier - specifically, workers in child care settings and pre-kindergarten through 12th grade educators and staff. This group was initially in Tier 2 with other workers at high risk in a congregate setting. However, not only do they face the risks of acquisition and transmission (note: there is growing evidence that
older kids have higher risk of transmission) but remote care and education is also associated with very high risk of negative societal impact. There is strong evidence regarding the negative impact remote schooling is having on students in pre-kindergarten through 12th grade regarding educational advancement and access to meals and support services for children, which disproportionately affects low-income families.

### PHASE 1B OBJECTIVE

To protect those who are at high risk of exposure given the nature of work, to reduce negative societal impact by maintaining critical infrastructure for social and economic systems, and to reduce the negative societal impact on families and children (that disproportionately affects low-income families)

### PHASE 1B GUIDANCE

Workers in child care settings
Pre-kindergarten through 12th grade educators and staff

- This category should consider the full spectrum of workers including administrators, environmental services staff, maintenance workers, school bus drivers, paraeducators, and all of who are essential to child care and education.
- Specifically, this group includes those who face substantially high risk of exposure given work conditions because they are operating in a congregate setting interacting with co-workers or youth over extended periods of time.
- Eligible child care includes:
  - Licensed family home child care providers, and the family members living in their home.
  - License-exempt family, friends, and neighbor providers that accept Working Connections Child Care subsidy. These in-home providers can serve up to 6 children.
  - ECEAP, Washington’s state-funded preschool providers. This is similar to the national Head Start program, which is named in the directive.
  - License-exempt school-age and youth development providers who have been providing care to school-age children since the pandemic began and schools were closed. As schools moved to online and hybrid models, these programs have continued to provide child care for school-age children.
- Attention should be given to the specific programs that reach children with special health care needs, individual educational plans, technological gaps, and migrant education programs.

### Phase 1b - Tier 2

**Overarching Groups:**

- High-risk critical workers who work in certain congregate settings
- People who are pregnant
- People with a disability that puts them at high risk

Phase 1b Tier 2 includes a subset of high-risk critical worker groups\(^1\) who work in certain congregate settings. Occupational risk factors for COVID include setting (time inside vs. outside), proximity (to co-workers and/or customers), type of contact (physical, surface), duration, daily number of contacts,

\(^1\) See [Washington Essential Critical Infrastructure Workers](#) for most up-to-date list of essential worker groups
capability to assess possible infection (screening), consistent access to/ability to use protection, cleaning (frequency), and barriers to healthcare access. The course of the pandemic in Washington state indicates that specific groups of workers operating in congregate settings—such as, agricultural workers, food processing, and incarceration facilities—have experienced significantly elevated rates of infection given the nature of their working and/or living conditions. In addition, the working and living conditions contribute to transmission at work and in the community. Other critical worker groups are included in future phases.

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<th><strong>PHASE 1B-2 OBJECTIVE</strong></th>
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</table>
| To protect those who are at high risk of exposure and transmission given the nature of working and living conditions, to prevent hospitalizations and rates of severe morbidity and mortality, and to reduce negative societal impact by maintaining critical infrastructure for social and economic systems | Certain critical workers with significantly high risk of exposure and transmission in certain congregate settings

Congregate setting refers to an environment where individuals work and/or live in an enclosed space where they are interacting with a high volume of people (i.e., supermarket) over extended time and not able to consistently social distance (i.e., be more than 6 feet apart).

This does not include all critical worker groups but just a subset outlined below. This subset is focused on workers who are working in a congregate/enclosed setting working within 6 feet of other workers over an extended time (3 or more hours in 24-hour day). **Therefore, workers who are able to socially distance, work remotely or work off-site not in a congregate setting would not be included.** Specific groups and guidance are outlined below:

- **Congregate agriculture** – specifically those who work and/or live in a congregate setting interacting with a high volume of co-workers (vs. animals) over extended periods of time (i.e. 3 or more hours in a 24-hour day). Relevant roles are more likely to include crop selection, production and packaging vs. equipment maintenance
- **Congregate food processing** – specifically those who work and/or live in a congregate setting interacting with high volume of co-workers (vs. animals) over extended periods of time (i.e. 3 or more hours in a 24-hour day). Also includes those working in fishing vessels.
- **Workers in congregate grocery stores or food banks** - specifically those who work in a congregate setting interacting with high volume of co-workers over extended periods of time (i.e. 3 or more hours in a 24-hour day). We encourage considering prioritizing retail stores of higher density/volume (e.g., grocery stores, higher volume retail/convenience stores providing groceries) vs. where people are more able to be socially distant (e.g., wineries, coffee shops).
- **Congregate staff in correction facilities, prisons, jails, detention facilities, and court facilities** – specifically those who are interacting with high volume of individuals in a congregate interior setting over extended periods of time (i.e. 3 or more hours in a 24-hour day). We encourage considering the spectrum of staff (e.g. facility management, security, counselors) who fit this exposure criteria.
- **Congregate public transit** - specifically those who work in an enclosed (vs. outdoor) congregate setting interacting with high volume of co-workers or general public over extended periods of time (i.e. 3 or more hours in a 24-hour day) to facilitate the transport of people. Settings may include bus, train, ferry, airport, and other high density transportation settings – or lower density settings where individuals are tightly constricted over an extended time, specifically taxies, limos and ride-share private vehicles over 4 people. It does not include those who can work remotely or in an office where they can practice being socially distant.
Phase 1b Tier 2 also includes a subset of people with underlying conditions that put them at increased risk for severe illness if infected with COVID-19 leading to hospitalization, morbidity, and mortality that are anticipated to face challenges accessing care.

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<tr>
<th>PHASE 1B-2 OBJECTIVE</th>
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| To prevent hospitalization and rates of severe morbidity and mortality | • Pregnant people  
• People with a disability that puts them at high risk. This includes individuals with Down syndrome, a developmental disability, or an intellectual disability, or who are deaf/hard of hearing, blind/low-vision, or deafblind, AND that disability or an underlying medical condition increases their risk for severe outcomes per the [CDC’s list of the conditions that put people at increased risk of severe illness from COVID-19](https://www.cdc.gov/coronavirus/2019-ncov/daily-life-coping/conditions.html) (note: this is a living document that may be updated as science evolves). This includes three types of groups - specifically:  
  o People with a physical or intellectual disability where they cannot use protective measures (e.g., severe autism, epilepsy)  
  o People with a physical or intellectual disability that is clinically associated with severe outcomes if infected with COVID (e.g., down syndrome, neurological condition)  
  o People with a physical or intellectual disability AND at least one of the comorbidities or medical conditions that increases risk or may increase risk of severe illness from COVID-19 per the [CDC’s list of the conditions that put people at increased risk of severe illness from COVID-19](https://www.cdc.gov/coronavirus/2019-ncov/daily-life-coping/conditions.html) |

**Phase 1b - Tier 3**

**Overarching Groups:**

• People 16 years and older with 2 or more co-morbidities or underlying conditions  
• People 60 years and older

Phase 1b – Tier 3 includes people who have certain medical conditions that put them at increased risk for severe illness if infected with COVID leading to increased hospitalization, morbidity and mortality. The list of conditions is based upon research by CDC posted at [www.cdc.gov/coronavirus/2019-](https://www.cdc.gov/coronavirus/2019-).
It is a living document that may be updated as science evolves. This group also includes people over 60 years of age given high rates of hospitalization and severe morbidity and mortality associated with this older age bracket.

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<th>PHASE 1B-3 OBJECTIVE</th>
<th>PHASE 1B-3 GUIDANCE</th>
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<tr>
<td>To prevent hospitalization and rates of severe morbidity and mortality</td>
<td>People 16 years and older with 2 or more co-morbidities or underlying conditions per the <a href="https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html">CDC’s list of the conditions that put people at increased risk of severe illness from COVID-19</a>. Conditions on the entire list are included for consideration. People 60 years and older</td>
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**Phase 1b - Tier 4**

**Overarching Groups:**

- People (residents, staff, volunteers) in certain congregate living settings – specifically, correctional facilities, prisons, jails, and detention centers; group homes for people with disabilities; and congregate settings (e.g. shelters, temporary housing) where people experiencing homelessness live or access services
- An additional subset of at-risk critical workers in certain congregate settings – specifically, restaurants and food services, manufacturing and construction

Phase 1b – Tier 4 includes an additional subset of people in certain congregate settings where there is a high to medium risk of exposure and transmission who have not been covered in earlier tiers. Exposure risk is due to factors such as setting (time inside vs. outside), proximity (to co-workers and/or customers), type of contact (physical, surface), duration, daily number of contacts, capability to assess possible infection (screening), consistent access to/ability to use protection, cleaning (frequency), barriers to healthcare access, etc. The first group in Tier 4 includes people in specific congregate living settings where there is local data indicating high rates of infection and transmission and people in these settings tend to have a high prevalence of underlying conditions and vulnerabilities that put them at higher risk for severe outcomes. We recognize there are other congregate living settings (e.g. communal residences) and these residents should evaluate their eligibility via other groups and phases. The second group in Tier 4 a subset of critical workers who are operating in congregate settings that have indicated high rates of infection and transmission. Other critical workers in congregate settings will be eligible in Phase 2.
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<tr>
<th><strong>PHASE 1B-4 OBJECTIVE</strong></th>
<th><strong>PHASE 1B-4 GUIDANCE</strong></th>
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| To prevent hospitalization and rates of severe morbidity and mortality, including in settings that increase potential exposure - and to reduce negative societal impact by maintaining critical infrastructure for social and economic systems | **People (residents, staff, volunteers) in certain congregate living settings** given high rates of infection and transmission and high prevalence of underlying conditions and vulnerabilities that put them at higher risk for hospitalization and severe outcomes. Thus, this does not include all people living in congregate living settings. Specific settings include:  
- Residents and staff in group homes for individuals with disabilities, including serious mental illness, development and intellectual disabilities, and physical disabilities as well as residential substance use disorder facilities not already covered in Phase 1  
- People in prisons, jails, detention centers, and similar congregate facilities and staff who work in such settings not already covered in previous phases or tiers  
- Residents and staff working in congregate settings that serve people experiencing homelessness that access services or live in the congregate settings (e.g. temporary housing, shelters) who are not already covered above  
- People living or residing in domestic violence shelters and staff who work in such settings  

**Certain critical workers with high-medium risk of exposure and transmission in certain congregate settings**  
Congregate setting refers to an environment where individuals work in an enclosed space where they are interacting with a high volume of people over an extended time and are not able to consistently social distance (i.e., be more than 6 feet apart). **Workers in these settings who are able to socially distance, work remotely or work off-site not in a congregate setting would not be included.**  
This does not include all critical worker groups but just a subset outlined below based upon Washington State COVID-19 outbreak reports. Specific groups and guidance are outlined below:  
- **Restaurants and food services** - specifically those who work in an enclosed congregate setting where they are in close proximity of a high volume of individuals over an extended period of time (i.e. >3 hours in 24 hour day).  
- **Manufacturing** - specifically those who work in an enclosed congregate setting interacting with high volume of individuals over an extended period of time (i.e., >3 hours in 24 hour day).  
- **Construction** - specifically those who work in a congregate setting (indoor or outdoor) where it is not possible to be socially distant and the individual is interacting with a high volume of individuals over an extended period of time (i.e., >3 hours in 24 hour day). |

**Phases 2 and 3**

**Overarching Groups:**
- All people not yet covered in Phase 1
**PHASE 2 and 3 OBJECTIVE**

To protect those who are at *substantially* high risk of exposure and have not yet been covered. To protect those who are at *moderately* high risk of exposure.

**PHASE 2 and 3 GUIDANCE**

All people 16 years and older who are not already covered.

We combined phases 2 and 3 after the Secretary of Health and Human Services directed that all persons eligible to receive COVID-19 vaccine will be included as of May 1, 2021.