



October 14, 2021

Martin J. Walsh
Secretary
United States Department of Labor
200 Constitution Avenue NW
Washington, D.C. 20210

James Frederick
Acting Assistant Secretary of Labor for Occupational Safety and Health
United States Department of Labor
200 Constitution Avenue NW
Washington, D.C. 20210

Dear Secretary Walsh and Acting Assistant Secretary Frederick,

On behalf of First Focus on Children, Families USA, Health Leads, the School-Based Health Alliance, and the Vaccine-Equity Cooperative, we are writing to share our concerns about vaccination access among underserved communities, including children. President Biden recently announced that employers with more than 100 workers must require their employees to be vaccinated against COVID-19 or be tested weekly. We are pleased to see that through this announcement, employers are required to provide their employees with paid leave to get vaccinated and recover from any vaccine side effects.¹ However, the administration's announcement did not specify if this paid time off applies to parents to secure vaccines for their children. When implementing this paid leave provision, we urge the Department of Labor (DOL) and the Occupational Safety and Health Administration (OSHA) to allow paid time off not just for employees to get vaccinated, but **also attend to the vaccination and recovery needs of their children.**

Providing paid leave is vital to both ensuring a safe and healthy workforce, and helping to alleviate some disparities in vaccine distribution that we are witnessing in children and adults. To date, vaccination rates among already-eligible children and adolescents are lagging. As of October 6, only 45 percent of 12-17 year-olds were fully vaccinated, and the rates of children

receiving their first dose have declined in recent weeks.ⁱⁱ The administration must do everything within its authority to ensure wide uptake of the vaccine among youth, which will protect them as well as their families and communities. Providing paid leave to employees for the vaccination and recovery of the children they care for will help increase youth vaccination rates as well as maintain a healthy and stable workforce with fewer interruptions to caregivers' work schedules.

We have seen encouraging signs from the Biden administration over the last few months as it turns to addressing children and COVID-19 vaccines. The administration has created the Student Corps to engage young people to become ambassadors to their peers and communities for vaccine information; partnered with celebrities and other respected voices on outreach efforts; and encouraged school districts to host vaccination clinics. This opportunity to expand coverage for employees' paid time off enhances the administration's efforts towards achieving equitable distribution and take-up of the COVID-19 vaccine in children.

As vaccine eligibility is extended to younger children, there will be even more challenges than we have seen in currently-eligible populations, including distribution methods and locations for reaching kids equitably, caregivers with low vaccine confidence, the misperception that COVID-19 does not impact kids, and the politicization of vaccines and public health. In addition, because children cannot take themselves to get the vaccine and generally need a caregiver with them, having to miss work is a huge impediment for caregivers securing a COVID-19 vaccine for their children. The administration clearly and correctly acknowledges the need for time off to access vaccines, but guaranteeing caregivers' paid time off is imperative to ensure both children and workers have the best possible protection against this virus.

Without this action, the administration will create additional disparities for children. Lower-income workers who cannot easily take time off work will have a harder time getting their kids vaccinated compared workers with more generous benefits due to the limited time they have to address their children's needs. In addition, according to the Kaiser Family Foundation, more than half (56 percent) of the working mothers who must miss work when their children are sick forgo their wages when they take time off, which can contribute to economic hardships for families.ⁱⁱⁱ In order to protect America's children and avoid exacerbating existing health and economic disparities, workers must be given paid time off to vaccinate the children under their care.

As adults, we must do everything in our power to protect children, which includes providing equitable access to the COVID-19 vaccine. We applaud the administration for recognizing the need for paid leave, and we urge you to ensure that workers can protect their children and families as well. Please do not hesitate to contact us if you require any additional information.

Sincerely,

First Focus on Children
Families USA
Health Leads
School-Based Health Alliance
Vaccine Equity Cooperative

ⁱ Hirsch, Lauren. “Biden Asks OSHA to Order Vaccine Mandates at Large Employers.” New York Times, September 9, 2021, <https://www.nytimes.com/2021/09/09/business/osha-vaccine-biden-mandate.html>

ⁱⁱ *Children and COVID-19 Vaccination Trends: AAP Analysis of Data Posted by the Centers for Disease Control and Prevention as of October 6, 2021*. American Academy of Pediatrics, October 6, 2021, <https://downloads.aap.org/AAP/PDF/Child%20Vaccinations%20Report%20US%20and%20by%20State%20Oct%206%20clean.pdf>

ⁱⁱⁱ Ranji, Usha, Michelle Long, Alina Salganicoff. *Coronavirus Puts a Spotlight on Paid Leave Policies*. Kaiser Family Foundation, December 14, 2020, <https://www.kff.org/coronavirus-covid-19/issue-brief/coronavirus-puts-a-spotlight-on-paid-leave-policies/>