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May 18, 2021

The Honorable Xavier Becerra  
Secretary of Health and Human Services  
U.S. Department of Health and Human Services  
200 Independence Ave. SW  
Washington, D.C. 20201

Rochelle P. Walensky, M.D., M.P.H.  
Director  
Centers for Disease Control and Prevention  
U.S. Department of Health and Human Services  
1600 Clifton Road  
Atlanta, GA 30329

Dear Secretary Becerra and Director Walensky:

Public Citizen, a consumer advocacy organization with more than 500,000 members and supporters nationwide, is writing to express serious concern regarding the dangerously inadequate process undertaken by the Centers for Disease Control and Prevention (CDC) to develop and issue the agency's revised guidance on mask wearing by people who are fully vaccinated for COVID-19.

As you are aware, the revised guidance, which was abruptly issued on May 13,<sup>1</sup> has predictably created widespread confusion across the U.S. and engendered substantial criticism of the CDC from numerous public health and medical experts, among others.

With only 37% of the U.S. population fully vaccinated, daily confirmed COVID-19 cases and deaths in the country averaging more than 30,000 and 550, respectively, and many unvaccinated people already refusing to wear masks, the sudden relaxation of the CDC's guidelines on mask wearing is premature, violates the precautionary principle of public health, and may lead to another surge in infections in many communities.

Irrespective of the merits of the CDC's revised guidance, among the most troubling aspects of the agency's decision to loosen its guidelines on mask wearing by fully vaccinated people was the failure of the agency to engage in a transparent, consultative process with the multiple affected stakeholders — including state and local public health and occupational health and safety officials; public health, occupational health and safety, and medical experts; teachers and

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<sup>1</sup> Centers for Disease Control and Prevention. COVID-19. Interim public health recommendations for fully vaccinated people. Updated May 13, 2021. <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated-guidance.html>. Accessed May 17, 2021.

school administrators; labor unions; and business leaders — before making such a consequential public health decision in the midst of the ongoing COVID-19 pandemic.

At a minimum, the CDC should have convened a public meeting of one of its standing advisory committees — such as the Board of Scientific Counselors, Deputy Director for Infectious Diseases (BSC, DDID)<sup>2</sup> — to discuss and make recommendations regarding the revisions to the existing guidelines on mask wearing that were being contemplated by the agency. This would have allowed the wide array of affected stakeholders and members of the public to prospectively share their views on the proposed changes, ensured that the CDC fully understood the potential ramifications of these changes, helped rebuild public confidence in the agency, and avoided the widespread confusion that has ensued since May 13.

We acknowledge that at the start of the pandemic, there was an urgent need for the CDC to quickly issue guidelines on important public health measures to address the unfolding public health emergency; under such circumstances, prior consultation with an advisory committee at a public meeting may not have been reasonable or feasible. In contrast, there was no urgent need for the CDC to abruptly loosen current key national public health guidelines for controlling the pandemic, such as those related to mask wearing, without crucial, feasible prior consultation with an advisory committee at a public meeting.

Although significant damage from the CDC's ill-informed actions last week has already been done, Public Citizen urges you to promptly convene an appropriate CDC advisory committee to reconsider the most recent changes to the agency's guidelines on mask wearing for people who are fully vaccinated for COVID-19. The agency also should convene an advisory committee meeting before making any future major decision about loosening guidelines on key public health measures that have been critical to containing the pandemic.

Thank you for considering our comments on this important public health issue.

Sincerely,



Michael A. Carome, M.D.  
Director  
Public Citizen's Health Research Group

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<sup>2</sup> Centers for Disease Control and Prevention. CDC Federal Advisory Committees. Board of Scientific Counselors, Deputy Director for Infectious Diseases (BSC, DDID). <https://www.cdc.gov/faca/committees/bscddid.html>. Accessed May 17, 2021.