



March 8, 2021

Mr. Jeffrey Zients  
 COVID-19 Recovery Team Coordinator  
 The White House  
 1600 Pennsylvania Ave., NW  
 Washington, D.C. 20500

Dear Mr. Zients:

Thank you for your leadership in strengthening the U.S. response to the COVID-19 pandemic. As representatives of America's aviation, travel, and tourism industries, we share President Biden's commitment to data-driven, risk-based, and feasible public health measures that save lives and allow travel and economic growth to safely resume.

With that goal in mind, we urge the COVID-19 recovery team to partner with us and quickly develop uniform, targeted federal guidance for temporary COVID-19 health credentials (CHC) covering both tests and vaccinations. Such federal guidance would result in several benefits, including:

- Improving the efficiency and accuracy of verifying health records;
- Strengthening countries' risk mitigation efforts;
- Preserving the privacy of passenger health data;
- Ensuring an exclusive focus on COVID-19;
- Expanding the use of testing and vaccinations as an additional layer of protection against the virus; and
- Accelerating safe economic activity and recovery.

As the COVID-19 crisis continues, it is essential to prioritize safety measures, while also recognizing the risk of worsening economic hardships. We appreciate the Biden Administration's recent decision to pause consideration of a testing requirement for domestic air travel. Data shows that universal mask wearing, physical distancing, state-of-the-art air filtration systems, and other precautions have significantly reduced the risk of COVID-19 transmission throughout the air travel process, removing the need for a domestic testing mandate. Similarly, with the combination of

these strong risk-based protections and a testing requirement for inbound travel, we firmly believe that COVID-19 vaccines should not be a requirement for domestic or international travel.

However, it is crucial to establish uniform guidance for CHCs. Global efforts to create CHCs are already underway, and while we understand and support the critical need for an internationally harmonized approach, the U.S. must be a leader in this development. The current diverse and fragmented digital health credentials used to implement different countries' air travel testing requirements risk causing confusion, reducing compliance, and increasing fraud. By quickly establishing federal guidelines for CHCs, the Centers for Disease Control and Prevention (CDC) can help lead the global discussion, increasing certainty that test results are legitimate, prioritizing passenger privacy, improving operational efficiency for the aviation industry ecosystem, and strengthening protections against importation of the virus.

Currently, the World Health Organization (WHO) and the International Civil Aviation Organization (ICAO) are working closely to identify the necessary information that would be contained in a medical record and a travel document. We also strongly encourage the U.S. interagency working group, including the CDC and the State Department, to proactively develop a roadmap for the rollout of recommended travel documentations and build a system supporting CHCs that verify both testing and vaccination records.

These federal efforts should be done in coordination with airlines, airports, unions, and other key stakeholders. In addition, some of the principles that should shape the development of federal guidance for CHCs include:

- **Simple and secure identity verification** by ensuring identities can be verified through commonly accepted source documents, biometrics, or other forms of travel identification;
- **Privacy-driven displays of personal health records** by establishing a clear means of displaying the traveler's testing and /or vaccine status (i.e. red/green);
- **Interoperability across jurisdictions** by ensuring CHCs can be validated by local, state, and federal agencies, private businesses, and foreign governments;
- **Tied to records of health care providers** to validate the legitimacy of the test or vaccine records;
- **Capable of rules-based processing**, which eliminates the need for airports and crewmembers to know multiple jurisdictional requirements;
- **Strong protections for personal data** by complying with applicable privacy laws and information security best practices;
- **Compliant with federal regulations for laboratory results;**
- **Compliant with international health data standards;** and
- **Configured with open source data and coding** to ensure connectivity to labs and existing health data systems, so test results can be confirmed as valid.

Federal guidance for CHCs has the potential to benefit more than just air travel. It could encourage more widespread adoption of processes to verify testing and vaccination records, from sports arenas to restaurants, business meetings, theme parks, and more. CHCs could expand the number of businesses that can easily use testing and vaccination practices, in addition to physical distancing, mask wearing, enhanced sanitation, and other protections.

We are committed to continuing our partnership with the COVID-19 response team and relevant federal agencies to develop and implement risk-based, data-driven public health measures that enhance the safety of flying. We hope you will continue to look to us to provide input from aviation

and travel stakeholders as you develop additional measures to ensure that implementation will be timely, smooth, and effective.

Again, thank you for your focus on protecting the United States from the health and economic damage inflicted by COVID-19. We look forward to continuing our work together to safely and responsibly restore domestic and international air travel.

*Aeronautical Repair Station Association*  
*Aerospace Industries Association*  
*Air Traffic Control Association*  
*Airline Passenger Experience Association*  
*Airlines for America*  
*Airports Council International-North America*  
*Allied Pilots Association*  
*American Association of Airport Executives*  
*American Hotel and Lodging Association*  
*American Society of Travel Advisors*  
*Association of Flight Attendants – CWA*  
*Association of Professional Flight Attendants*  
*Cargo Airline Association*  
*General Aviation Manufacturers Association*  
*Global Business Travel Association*  
*International Air Transport Association*  
*International Association of Airport Executives*  
*International Flight Services Association*  
*National Air Carrier Association*  
*National Air Transportation Association*  
*Radio Technical Commission for Aeronautics*  
*Regional Air Cargo Carriers Association*  
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*Travel Technology Association*  
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*U.S. Chamber of Commerce*  
*U.S. Travel Association*