

To: State and Local Officials
From: Sabeena Hickman, President & CEO
Date: March 21, 2020
Re: Essential Worker Classifications

As the President & CEO of the Pool & Hot Tub Alliance, the largest national association representing pool and hot tub professionals, I am reaching out to all elected officials across the country to provide information about how our industry is a critical component of the continued preservation of public health and safety during these unprecedented times we find ourselves in as a country. As each state and locality determines necessary means to protect its citizens, we are asking you to **strongly** consider our industry as “Essential Businesses” during the COVID-19 response for the following reasons:

- U.S. Centers for Disease Control and Prevention has stated there is no evidence that COVID-19 can be spread to humans through the use of pools and hot tubs and have stated that: “Proper operation, maintenance, and disinfection (e.g., with chlorine and bromine) of pools and hot tubs should remove or inactivate the virus that causes COVID-19.”¹ Additionally, the World Health Organization states that controlling water quality **is necessary** to prevent the transmission of infectious diseases. Proper circulation maintenance and chemical treatment mitigate the growth of pathogens and mosquito breeding grounds.
- U.S. Cybersecurity and Infrastructure Security Agency guidance² on industries that qualify as essential workforce provides multiple provisions that are applicable to the pool and spa industry:
 - PUBLIC WORKS: “Workers such as plumbers, electricians, exterminators, **and other service providers who provide services that are necessary to maintaining the safety, sanitation, and essential operation of residences.**”
 - PUBLIC HEALTH: “Manufacturers...warehouse operators, and distributors of...**cleaning, sanitizing, disinfecting or sterilization supplies...**”
 - WATER AND WASTEWATER: “Chemical disinfectant suppliers for...**personnel protection.**”
 - CRITICAL MANUFACTURING: “Workers necessary for the manufacturing of materials and products needed for...**chemical manufacturing...**”
 - CHEMICAL:
 - “**Workers supporting the chemical supply chains...**including workers at chemical manufacturing plants...workers at distribution facilities...”
 - “**Workers who support the production and transportation of chlorine...**and prevents the contamination...of water.”
- Without proper pool and hot tub maintenance (which includes circulation and treatment of water) various pathogens can grow, such as Pseudomonas, Cryptosporidium, E. Coli, Shigella, etc. It can also create a

¹ CDC Bulletin at <https://www.cdc.gov/coronavirus/2019-ncov/php/water.html>

² CISA Bulletin, Public Works Section, at <https://www.cisa.gov/publication/guidance-essential-critical-infrastructure-workforce>

breeding ground for mosquitoes, other pests and the diseases (West Nile Virus and Zika Virus) they may carry, which presents a risk not only to bathers but to the entire community at large.

- Additionally, it is critically important that active inground pool and hot tub projects be completed. Unfinished projects pose significant public safety risks as potential issues such as cave-ins and pool popping, as well as the dangers resulting from an active construction site. And, the impact of long-term exposure to the elements may result in the community health issues noted above.
- Service technicians very typically travel alone to deliver service and do not engage in-person with the property owner. Retailers are making accommodations to service customers with curbside pick-up, ship-to-home, and the like. Builders working to finish an active in-ground pool and spa construction project are being urged to have staff travel in multiple vehicles to limit close contact. Distribution and chemical manufacturers are providing critical sanitization and disinfection materials not only for the 12 million Americans who have our products in their backyard, but for other critical uses during this time such as surface disinfection.

PHTA and its members firmly believe the companies that supply pool sanitization and disinfection materials (through manufacturing, distribution or retail stores), the companies that manage the maintenance of swimming pools, hot tubs and other artificial bodies of water and the companies currently constructing inground pools and spas are essential to preventing the transmission of infectious diseases, helping maintain community health, and ensuring public safety.

As children and families across the country are being asked to reduce outside contact or even shelter at home, and with gyms and other public facilities closing, the backyard pool, spa or hot tub provides the ideal way for families to focus on their health and well-being. The business of maintaining clean, safe, and healthy recreational bodies of water is central to preventing the spread of COVID-19, various pathogens that can grow in untreated water and other diseases that can easily spread through pools and spas that are not properly treated. These pools and hot tubs must be properly maintained to ensure proper sanitation measures are taking place.

As we move into warmer months, I am writing to you today to ask that pool maintenance/service providers, retailers, distributors, chemical manufacturers, and builders be classified as ESSENTIAL BUSINESSES to ensure the prevention of infectious disease growth and transmission of disease through otherwise un-sanitized and non-operable pools. To do otherwise, will only provide additional vectors for the spread of COVID-19 and other complicating diseases that would compound the challenges facing our health care infrastructure.

Thank you for your consideration and leadership during this difficult time.

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The Pool & Hot Tub Alliance was formed in 2019, combining the Association of Pool & Spa Professionals (APSP) and the National Swimming Pool Foundation (NSPF). With the mission to “Celebrate the Water,” PHTA facilitates the expansion of swimming, water safety and related research and outreach activities aimed at introducing more people to swimming, making swimming environments safer and keeping pools open to serve communities. PHTA, is the world’s oldest and largest association representing swimming pool, hot tub, and spa manufacturers, distributors, manufacturers’ agents, designers, builders, installers, suppliers, retailers, and service professionals.