The Honorable Christopher Krebs  
Director  
Cybersecurity and Infrastructure Security Agency  
U.S. Department of Homeland Security  
Washington, D.C. 20528  

Dear Director Krebs:  

On behalf of the American Council of Engineering Companies (ACEC) – the business association of the nation’s engineering industry – we want to thank you for the work put forward so far by DHS/CISA to identify essential infrastructure workers needed to ensure continuity of functions critical to public health and safety, as well as economic and national security, in response to the COVID-19 crisis. The guidance has been helpful in achieving common approaches and policies among the states and will serve to keep important sectors of the economy engaged which will help to jump start growth as we work beyond the pandemic.  

With this in mind, we would like to put forward recommendations for additional refinements to the guidance as it applies to the engineering industry. ACEC represents nearly 6,000 member firms, employing over 600,000 engineers, architects, land surveyors, and technical specialists, such as environmental scientists, geologists, and planners, who are responsible for the design of the built environment (physical infrastructure). The industry encompasses all engineering disciplines requiring professional licensing, who work to ensure that infrastructure is safe, functional, sustainable, and resilient.  

In reviewing the DHS/CISA Guidance on the Essential Critical Infrastructure Workforce: Ensuring Community and National Resilience in COVID-19 Response Version 2.0, as well as the recently released version 3.0, there appears to be a strong connection between the services engineering firms perform and the market sectors and related services deemed essential. Engineering firms are supporting government agencies in their critical activities. Our firms are involved in efforts to assure continuity of operations across all the infrastructure and industries addressed in the guidance. This includes continuous inspections to assess deterioration due to aging, weather, and hazards; completion of ongoing construction; assessing the ability to repurpose for pandemic response; renovating to protect public and worker health and safety; designing needed changes to existing infrastructure and new infrastructure identified; support for ongoing and changing of operations and maintenance of existing infrastructure; and similar activities. To be accomplished properly, these activities require site access and visits. We believe the guidance would be improved through more specific references to the services needed to support the critical sectors referenced, with particular emphasis on the necessary licensed professional engineering, architectural, and land surveying, and environmental science and related services. In addition, more explicit guidance that connects essential design
professionals to critical infrastructure will help governments at all levels to better conform their respective policies. ACEC asks that an addition be made to the guidance as follows:

CROSS INDUSTRY AND INFRASTRUCTURE ESSENTIAL CRITICAL FUNCTIONS

- Licensed engineering and other design professionals and support personnel performing safety and functional inspections of physical infrastructure, to include buildings, transportation, energy, manufacturing, healthcare, logistics, water, waste, and utilities related facilities.
- Licensed engineering and other design professionals and support personnel performing functions related to the operations, maintenance, expansion, or renovation for reuse of essential critical public or private infrastructure.
- Licensed engineering and other design professionals and support personnel performing functions related to the completion of ongoing construction deemed to be essential and critical to pandemic response, economic recovery, or quality of life.
- Licensed engineering and other design professionals and support personnel performing planning and design of new or repurposing of existing infrastructure deemed to be essential and critical to pandemic response, economic recovery, or quality of life.

Thank you for your attention and consideration of these recommendations. If we can provide you with additional information or assistance, please do not hesitate to contact me.

Sincerely,

Linda Bauer Darr
President & CEO