



March 13, 2020

The Honorable Alex Azar
Secretary
U.S. Department of Health and Human Services
200 Independence Ave., S.W.
Washington, D.C. 20201

Dear Secretary Azar:

I am writing on behalf of Argentum, the leading national association exclusively dedicated to supporting companies operating professionally managed, resident-centered senior living communities and the older adults and families they serve. Argentum member communities offer assisted living, independent living, continuing care, and memory care services, representing approximately 75 percent of the professionally managed senior living industry. We sincerely appreciate your continued support and leadership in combatting the ongoing COVID-19 pandemic and ask that our communities, residents, and staff be prioritized, particularly with regards to timely and sufficient testing supplies, as the administration continues its effort to prevent the spread and respond to the outbreak of this virus.

COVID-19 presents unique challenges to the senior living industry and the more than 800,000 residents across 29,000 communities throughout the United States. More than half of all residents are over the age of 85, and another 30% are between the ages of 75-84. They often cope with multiple chronic conditions, with more than half suffering from hypertension and a third with heart disease.

As you're aware, individuals who are at the greatest risk for severe disease and death from the virus include people aged over 60 years and those with underlying conditions such as hypertension, diabetes, cardiovascular disease, chronic respiratory disease and cancer. While the flu generally kills fewer than 1% of those infected, available data on COVID-19 indicates a death rate of 3.4%, rising to 8% for patients ages 70-79, and to 14.8% in patients over 80 years of age.

Professionally managed senior living providers already have significant plans in place for emergency situations, and they follow infection control procedures and protocol every day to prevent the spread of illness. To minimize risk to their residents and staff, many companies and communities are taking additional steps to prevent the transmission of the virus, including limiting visitors and reminding staff and visitors to stay home if they are feeling ill. Argentum is also continually updating a [comprehensive toolkit](#) for providers and communities on ways to prevent the spread of the virus and respond as needed.

We recommend that the CDC clarify protocols that residential care facilities and state agencies should follow when a member of the community becomes symptomatic. The protocol should clarify that testing supplies should be readily available and that all residents and staff should be immediately tested. Any resident who tests positive should be relocated to a healthcare facility equipped for infectious disease control, staff who test positive should self-quarantine outside of

the community, and communities should restrict access and implement infectious disease control procedures.

As our communities continue to implement these measures, we request that the administration prioritize our communities, residents, and staff to ensure we have the resources needed to prevent, test for, and respond to any outbreaks. In terms of prevention, we are specifically requesting personal protective equipment (PPE) to properly protect against the spread of the virus, including respirators, facemasks, eye protection, medical gown, and gloves.

To ensure that the virus does not spread undetected and we are able to protect healthy residents and staff, we request that the administration prioritize timely testing of suspected cases of the virus so that our communities are able to expedite escalated infection control protocols as needed.

As vaccines and treatment progress in development, we request that given the vulnerable populations that senior living serves, our communities should be prioritized to prevent the continued spread of the virus and health problems that are more prevalent to the elderly and those with chronic medical conditions.

Finally, we appreciate any flexibility the administration is able to make with regards to expanded use and reduced out-of-pocket costs of telehealth. These technologies hold enormous promise for evaluating and treating patients without exposing potentially infected individuals to those who are healthy. We appreciate the temporary telehealth provisions included in PL 116-123, and further support policies that will encourage the use of telehealth whenever possible, including outside of the scope of a publicly declared health emergency.

The senior living industry is prepared to respond to the ongoing challenges presented by the COVID-19 pandemic. We greatly appreciate the steps that this administration has already taken to combat the virus, and ask that future actions consider the vulnerable populations served by senior living and prioritize resources, supplies to include timely access to tests, and policies that will help to combat the spread of the virus and ensure an adequate response in the event of an outbreak to reduce the overall effect of this pandemic on society.

If you have any questions about the needs of our communities, or if Argentum can be of assistance as you move forward, please do not hesitate to contact me at either (703) 894-1805 or jbalda@argentum.org.

Respectfully,



James Balda
President & CEO
Argentum