



December 1, 2020

José Romero, M.D., FAAP
Chair
Advisory Committee on Immunization Practices
1600 Clifton Road, N.E.
Mailstop A27
Atlanta, GA 30329-4027
Submitted Electronically via www.regulations.gov

Docket #CDC-2020-0121

Dear Dr. Romero:

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, we appreciate the opportunity to provide comments to the Advisory Committee's recommendations on the Phased Allocation of COVID-19 Vaccines. We support the Committee's interim recommendation to prioritize residents and staff of long-term care facilities in Phase 1a and urge its formal adoption by the Centers for Disease Control and Prevention.

The members of Argentum operate senior living communities offering a continuum of care to include independent living, assisted living, memory care and Continuing Care Retirement Communities (CCRCs) to older adults and their families. These communities offer choice, dignity, security, and comfort in the final years of life, and are the home to nearly two million of our nation's most vulnerable populations to the COVID virus and employ nearly one million direct care and support staff. Since February, they have been on the frontlines of this pandemic, working tirelessly and compassionately to keep everyone safe, and eagerly anticipate the distribution and administration of safe and effective vaccines to residents and staff.

Seniors are the most vulnerable population to COVID-19 and residents in senior living communities are at increased risk of serious illness and death if infected with COVID-19. Nearly 80% of all COVID-19 deaths in the U.S. have occurred in people over the age of 65, and the average age for assisted living residents is 85 and 82 for independent living. Further, older adults who live in independent living and assisted living communities tend to be among those with the highest levels of chronic illness, functional impairment, and healthcare utilization. According to the CDC, people with chronic kidney disease, chronic lung disease (such as COPD), diabetes, and serious heart conditions are at a higher risk for severe illness from COVID-19. These conditions are more prevalent among assisted living residents: 68%, for those living in assisted living communities have at least one of these five conditions, compared to 49% of those living in private housing.

Additionally, residents often have a significant need for assistance with basic self-care or activities of daily living (ADLs) such as eating, dressing, bathing, and the management or administration of medication, and residents in independent living may need help with instrumental activities of daily living (IADL) such as transportation or shopping. This puts residents and staff, to include caregivers, nurses, housekeepers, and dining staff, at increased risk of contracting the disease or spreading it to others. Ultimately, we cannot serve our vulnerable seniors unless our staff are free from COVID-19; we need a healthy workforce that is vaccinated against the virus.

The physical challenges of caring for senior living residents is compounded by the high rates of cognitive and functional impairment, especially compared to older adults not residing in a senior living community. Over 42% of residents suffer from some type of cognitive impairment, and the interim preventive measures such as lockdowns have only accelerated functional and cognitive decline among this population, leading to poor health outcomes and increased health risks. In a recent report from the National Academics of Sciences, Engineering and Medicine, researchers found that social isolation was associated with a 50% increased risk of dementia. Preventing social isolation by fostering active social lives with regular personal contact, particularly by loved ones, may contribute to improved physical, psychological, spiritual, and emotional health of residents, and a vaccine is a critical step towards achieving this.

Senior living communities serve a similar high-risk population as skilled nursing facilities and likewise employ an essential health care workforce. In some cases, the risks of COVID-19 could be higher for senior living communities as residents tend to be more independent, more likely to congregate in the building's common areas, interact with others through communal dining or onsite programming, and to leave the building where they can be exposed to the virus. However, from the outset of the pandemic, senior living communities have not received the same levels of support and assistance in the COVID-19 response as nursing homes, in part due to conflating senior living with nursing facilities. This has led to a lack of prioritization for seniors and caregivers in these communities, including in the recommendation that in the event of vaccine shortages, a sub-prioritization would rank assisted living lower than skilled nursing. We strongly believe that all vulnerable older adults and the frontline workers in senior congregate care facilities should have equal access to a COVID-19 vaccine to prevent the spread of the virus and additional loss of life.

The senior living industry is committed to ensuring the safety of residents and workers during the COVID-19 emergency as well as their long-term health and social-emotional wellbeing. Access to safe and effective vaccines to long-term care and senior living residents and staff will help guard against the threat of COVID-19 and allow senior living communities the ability to better serve this most vulnerable population, and the caregivers who remain on the frontlines. While we recognize that prioritization is necessary given limited initial supplies, we strongly recommend that all senior congregate care settings be prioritized in Phase 1a, to include both residents and staff. And to improve efficiency of administration, both residents and staff should be given the vaccine at the same time.

We sincerely appreciate the opportunity to share the critical needs of the residents and staff of senior living communities as they relate to the prioritization of COVID-19 vaccines. If you have any questions about our comments, or if Argentum can be of assistance as the Committee or the CDC move forward, please do not hesitate to contact me at jbalda@argentum.org.

Respectfully,



James Balda
President & CEO
Argentum