



January 13, 2021

The Honorable Alex M. Azar
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, DC 20201

The Honorable Robert R. Redfield, MD
Director
U.S. Centers for Disease Control and Prevention
1600 Clifton Road
Atlanta, GA 30329

Dear Secretary Azar and Director Redfield:

On behalf of the nearly two million seniors residing in our nation's senior living communities, and cared for by nearly one million caregivers, we write to you with our extreme concern regarding yesterday's announcement from HHS, advising states to open vaccine distribution to all seniors aged 65 and older and others with high comorbidities. While we understand the need to expedite vaccination rates among this population, we believe this policy could leave vulnerable seniors in congregate care settings in potential jeopardy. The second dose must be held in reserve for this frail population which suffers higher mortality rates than other age groups, and we strongly support the Advisory Committee on Immunization Practices recommended top priority for senior congregate living settings.

Argentum is the leading national non-profit association representing 75% of these facilities that offer care for many of our nation's most vulnerable seniors, including assisted living, independent living, memory care and Continuing Care Retirement Communities (CCRCs). As we fight for vaccinations for the residents of our members, we must also stress that relief from the Provider Relief Fund (PRF) to assisted living facilities has been insufficient and slow in coming. In fact, many assisted living facilities are still waiting for relief from the PRF and closures loom.

We urge the Trump Administration to take immediate action to prioritize all senior congregate settings for both financial relief and vaccine distribution. These facilities have been on the frontlines of this pandemic since day one, working tirelessly and compassionately to keep everyone safe, and urgently need the financial resources to continue serving this most vulnerable population, and the vaccines that will help keep everyone safe. Further, we request that the Administration ensure adequate vaccine supplies are held in reserve for the critical second dose of the vaccine intended to be administered 21-28 days following the initial dose to achieve the maximum efficacy.

Argentum was pleased that the CDC recommended the prioritization of residents and staff of long-term care facilities in Phase 1a. However, we have learned that in some cases not all residents and staff will receive the vaccine in this initial wave, particularly those who are in an independent living setting. We believe this is short-sighted, as those in independent living communities often have the same risk profile as those in other long-term care settings. The average age for assisted living residents is 85, and is 82 for independent living, reflecting those

who are at increased risk of serious illness and death if infected with COVID-19. 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.

The CDC's estimate for vaccine distribution included 21 million individuals identified as healthcare personnel (including long-term care facilities), as well as 3 million long-term care facility residents, which included 1.3 million in skilled nursing, 800,000 in assisted living, and 900,000 in other residential care facilities. An estimated 400,000 older Americans reside in independent living facilities, and while we recognize that there are limited vaccines available at this time, we believe it is imperative that for both logistical efficiency and efficacy of delivering the vaccine to all residents within a community at the same time, that independent living residents should be included in the Phase 1a priority as we believe to be the original intent of the recommendations.

As to financial relief, Argentum asks for your continued assistance in prioritizing relief payments from the Provider Relief Fund. Nearly a year into this pandemic, many assisted living providers are still waiting for financial relief. We are increasingly concerned that as their financial resources are exhausted that communities will have no other choice than to close their doors and force these vulnerable seniors from their homes and caregivers. Based on internal surveys of our members:

- Of those that have received relief, **50% reported that it was less than 1% of their losses incurred in 2020.**
- Nearly 75% of respondents said their **expenses related to COVID-19 have increased significantly.**
- Half reported that **closures were imminent** within the next year if more relief is not received, a 20% increase from October 2020.

Senior living communities currently estimate COVID-related expenses to total \$11-15 billion as a result of PPE, testing, hero pay, and infection prevention and control resources for residents and staff. This is in addition to compounding losses which have already reached \$15 billion. Unlike other providers, whose losses were felt in the earlier days of this pandemic (due to loss of elective procedures), the senior living industry is suffering our most significant losses now and these losses will only be compounded in the future. This is due to the sharp decline in occupancy rate. Many providers are reporting declines in admissions of 75% compared to the same period in 2019.

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. This has led to a lack of prioritization for seniors and caregivers in these communities, both in the payments made available from the Provider Relief Fund, and in the prioritization of skilled nursing above assisted living (and now also independent living) for vaccine distribution. We strongly believe that all vulnerable older adults and the frontline workers in senior congregate care facilities should have equitable support to care for those most vulnerable, and to prevent the spread of the virus and additional loss of life.



We appreciate the efforts that this Administration is doing to mitigate the effects of the pandemic. However, the financial struggles of assisted living facilities due to the lengthy delays in relief are now dire, and vaccines are desperately needed for both assisted living and independent living residents and staff. Any assistance that you can provide in expediting relief and vaccines would be greatly appreciated, particularly any efforts to establish a clear path forward on vaccine distribution that will include all independent living facilities, both those co-located with assisted living and those that are freestanding facilities. The caregivers in our member communities are doing their utmost to care and protect our nation's most vulnerable population from this terrible virus; access to 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.

If you have any questions about the urgent needs of our member communities, please do not hesitate to contact me at jbalda@argentum.org.

Sincerely,

James Balda
President & CEO
Argentum