



March 30, 2021

Mr. Stephen Milligan
Deputy Assistant General Counsel (Banking & Finance)
U.S. Department of the Treasury
1500 Pennsylvania Ave, NW
Washington, D.C., 20220,

Dear Mr. Milligan,

On behalf of Argentum, we are requesting the status of guidelines being prepared for state governors and other officials regarding the approved use of state and local funding from the American Rescue Plan Act of 2021 (ARPA). We are also requesting that such guidelines include language that allows states the discretion to appropriate ARPA state funds to assisted living facilities to help mitigate the almost \$15 billion these providers have spent during the COVID-19 pandemic to keep their residents and employees safe and to compensate for the enormous amount of lost revenue these facilities have experienced.

Argentum is the largest national association representing owners and operators of assisted living, memory care, continuing care retirement and independent living communities. Argentum member communities and others care for seniors in the United States, the majority of whom need assistance with activities of daily living such as bathing, eating and toileting, as well as personal and health care services. The average age of assisted living residents is 85 years old, and many suffer from Alzheimer's or some form of dementia.

Nationwide, the senior living industry (does not include nursing homes) cares for approximately 2 million seniors, brings over \$265 billion annually to America's economy, and is a major factor in retirees' decisions in where they will receive their care. These communities provide an affordable option for seniors, most of whom pay for their senior living homes themselves, thus preserving Medicaid funding for the most financially challenged and frail seniors. However, this industry is now in trouble because of the pandemic.

Over the past year, senior living providers in the United States have incurred more than \$15 million in COVID-related expenses for procuring PPE, infection control supplies, hero pay and additional staff costs, as well as the lost revenue due to record-low occupancy rates — losses which are long-term, compounding and unsustainable. Many of the herculean efforts undertaken by senior living providers to protect their residents and staff were above and beyond their training and licensure but were mandated by the government, putting an unprecedented financial strain on these facilities.

To further the problem, more than 85 percent of these communities in the United States do not receive state or federal funding; residents pay for this care privately. This means these communities have not had the same access to federal relief as other providers.

For example, the federal CARES Act Provider Relief Fund gave assisted living facilities less than one tenth of the funding nursing homes were provided nationwide and no “per bed” funding, even though assisted living facilities were right there with nursing homes on the front lines fighting COVID-19 and suffering similar financial consequences.

Without direct action and support, senior living communities, including assisted living providers, will not receive meaningful funding from any of the federal relief packages.

We are writing today to request the following:

- **The status and anticipated completion date of guidelines being developed by the U.S. Department of the Treasury regarding the use by states of money allocated from the ARPA.**
- **Inclusion in the guidelines developed for state governors and other officials related to the use of ARPA funds that the provision of financial relief for assisted living providers for COVID-19 related expenses and lost revenue is authorized.**

Recouping some of the financial losses that these providers have incurred keeping their residents and employees safe could be the difference between remaining operational and closing their doors-- potentially sending more seniors out of their homes and into Medicaid-funded and more restrictive nursing home facilities.

These requests are critical, and we believe in perfect alignment with the goals of the ARPA. We respectfully ask for your careful consideration. Funding for senior living providers would enable them to not only recover from the battle against COVID-19 and remain viable living and care options for America’s seniors, but would also protect the availability of taxpayer-supported Medicaid funding for those who truly need it.

Sincerely,



James Balda
President & CEO