



August 27, 2021

The Honorable Joseph R. Biden, Jr.  
President of the United States  
The White House  
1600 Pennsylvania Ave, N.W.  
Washington, D.C. 20500

Dear President Biden,

As the nation continues its efforts to combat the COVID-19 pandemic, we are asking for your support to ensure the safety and wellbeing of seniors in congregate care settings, who remain the most at-risk from this virus. Nearly two million seniors call senior living home and are cared for by nearly one million caregivers, who have been on the front lines for a year and a half working tirelessly to keep everyone safe. They have incurred tremendous expenses and losses doing so—\$30 billion—yet provider relief remains disproportionately small and insufficient to keep our seniors safe. The vaccines have been critical, but with the recognition of the need for booster doses, it's imperative that senior living providers have the resources and support they need, both from the provider relief fund, and to secure the onsite vaccine clinics needed to keep our seniors safe.

We are asking for your support on behalf of Argentum, the leading national non-profit association representing 75% of facilities that care for many of our nation's most vulnerable seniors across assisted living, memory/dementia care, independent living, and Continuing Care Retirement Communities (CCRCs). As you know, older individuals and those with pre-existing conditions are most at risk of serious illness and death if infected with COVID-19, and this is particularly of concern for these seniors, as the average age of assisted living residents is 85, and for independent living the average age is 82. Many of these seniors are non-ambulatory and depend on daily assistance with activities such as eating, bathing and toileting, and additionally have high levels of chronic illness, functional impairment, and healthcare utilization.

Vaccines are perhaps the most critical element in guarding against the virus, and senior living facilities have led efforts to vaccinate both residents and staff, with overall vaccination rates higher than 99% of all U.S. counties. This was possible because of the prioritization of seniors and their caregivers, as established by Advisory Committee on Immunization Practices (ACIP), and because a relatively high percentage of facilities participated in the Pharmacy Partnership for Long-Term Care Program (PPLTCP), which targeted the resources and support to these communities. Argentum member companies were also proud to play their part in encouraging vaccination among residents and staff, and Argentum's Board of Directors also offered its support for employers to mandate vaccinations for their senior living workforce.

However, most senior living residents and caregivers have now passed or are approaching the six-month mark post-vaccination, where data from long-term care facilities has shown the effectiveness of the mRNA vaccines dropping from 96.2% immediately after vaccination to as low as 53% more recently. A third booster dose could be lifesaving, with studies showing the effectiveness increasing again to 86% for people over age 60. This is why it's imperative that the administration carefully consider the rollout of boosters to ensure our nation's most vulnerable, and those who care for them, are able to access boosters as quickly and efficiently

as possible. With increasing vaccination rates coupled with demand for boosters, this could put pressure on the already fragile supply chain and impede the ability of seniors to receive these life-saving vaccines.

Beyond prioritizing seniors and caregivers in congregate settings, there are other challenges that must be addressed in administering boosters to this largely non-ambulatory population. Due to the frail nature of residents, utilizing retail pharmacies and clinics is highly problematic and may be detrimental to their health and well-being. The PPLTCP enabled communities to be able to offer on-site clinics, which has proven to be highly effective, especially as communities do not have the cold-storage capabilities required for maintaining vaccine inventories. However, smaller communities still face challenges in offering on-site clinics due to pharmacies that require larger volumes or additional fees to be eligible.

Another challenge that senior living operators face is that most do not have nurses on staff to directly administer vaccines and/or are prevented by some state regulations from allowing nurses to administer medication or vaccinations. This is further exacerbated by the workforce shortages that have already limited staffing to be able to coordinate on-site clinics. The staffing challenges also hamper the ability to meet reporting requirements or reimbursement associated with vaccine administration.

These challenges are occurring while providers are facing unprecedented financial hardship from the pandemic, with more than half anticipating closures. Nationally, providers have suffered over \$30 billion in expenses and losses due to PPE, testing, cleaning, staffing needs and hero pay, as well as record-low occupancy rates. Unfortunately, relief to date has been disproportionately insufficient (less than 0.4% of the provider relief fund was allocated to assisted living providers according to a March 2021 report from the Government Accountability Office), and further, many providers have not received the full amount of relief that is owed based on the established formulas, or in other cases were inexplicably denied for relief altogether. Adding a new financial burden of administering vaccines would exacerbate these challenges even further.

For these reasons, we recommend that your administration take the following actions to ensure seniors and their caregivers remain protected, particularly with the rise in the Delta variant:

1. Prioritize seniors and staff for access to and administration of COVID-19 booster doses, particularly in congregate care settings to include assisted living, memory/dementia care, independent living, and CCRCs.
2. Establish a multi-faceted approach to administering COVID-19 boosters to incentivize long-term care pharmacies and local health departments to prioritize these communities and offer on-site clinics.
3. As medically appropriate, allow broad discretion in administration of COVID-19 boosters for seniors and staff in congregate care settings to provide flexibility and efficiency of on-site clinics, such as allowing for flexibility in age eligibility requirements, and providing for a window of eligibility (i.e., 6-10 months from prior vaccination).
4. Remove barriers to the ongoing administration of COVID-19 boosters by making available single-dose syringes and/or smaller vials to help minimize problems and penalties related to wasted vaccine.



Our nation's senior living communities offer choice, dignity, security, and comfort in the final years of life for our nation's seniors. We must ensure that these providers have all the resources available to protect seniors and their caregivers who have already endured so much over the past year and a half. Their heroic efforts are demonstrated in a survey from NORC at the University of Chicago, which found two-thirds of senior living facilities recording no COVID-19 related fatalities and the fatality rate in assisted living at 1/3 that of skilled nursing care facilities (SNFs) (19.3 fatalities per 1,000 residents in assisted living, compared to 59.6 per 1,000 in SNFs). Notably, these results are reflective of calendar year 2020, largely before vaccines became available to further protect residents and staff. Effectively administering boosters, and ensuring providers have the support they need, will be critical to continuing to keep this population safe.

We sincerely appreciate the attention that this administration has brought toward ending the pandemic, including with vaccines and recognizing the need for boosters. We also appreciate the efforts to ensure that smaller assisted living providers will not be left behind by offering providers additional support for vaccines administered in seniors' homes. We ask that you provide the same recognition, support, and prioritization for all of our nation's seniors in congregate care settings and their caregivers.

Please let us know if you have any questions or to discuss this matter further.

Sincerely,

James Balda  
President & CEO  
Argentum

CC: The Honorable Xavier Becerra, Secretary, Department of Health and Human Services  
The Honorable Rochelle Walensky, Director, Centers for Disease Control and Prevention