



August 9, 2021

The Honorable Rochelle P. Walensky, MD, MPH
Director
U.S. Centers for Disease Control and Prevention
1600 Clifton Road
Atlanta, GA 30329

Dear Director Walensky,

On behalf of Argentum, the leading national association representing senior living facilities where nearly two million older vulnerable Americans call home, we are writing regarding the need to ensure older Americans remain prioritized for vaccines and potential boosters to protect against COVID-19 and its variants, and the need to restore the Pharmacy Partnership for Long-Term Care Program (PPLTCP).

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, memory/dementia care, independent living, and Continuing Care Retirement Communities (CCRCs). These seniors and their nearly one million caregivers have been on the frontlines of this pandemic for over a year and a half facing the most severe challenges in keeping everyone safe. 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 our residents as the average age of assisted living residents is 85, and for independent living the average age is 82. Further, many residents of senior living facilities are those with the highest levels of chronic illness, functional impairment, healthcare utilization, or are non-ambulatory.

We were pleased that residents and caregivers in most senior living facilities were prioritized under Phase 1a by the Advisory Committee on Immunization Practices (ACIP), and that these individuals were able to receive their vaccines through the PPLTCP. These decisions were instrumental in saving countless lives, and senior living providers were proud to be on the frontlines encouraging residents and staff to get vaccinated. According to an internal survey we conducted last month, resident vaccination rates continue to remain high at over 90% and staff vaccination rates continue to improve with more than 7 out of 10 workers being vaccinated against COVID-19. Overall vaccination rates within senior living communities are higher than 99% of all U.S. counties and more than double nearly 2/3 of counties.

As the CDC reviews the data on the long-term efficacy of vaccines and the potential need for boosters, we strongly encourage that the recommendations of ACIP be taken into account and that senior congregate care settings again be prioritized for administration of vaccines on-site through the PPLTCP and that independent living communities which were previously excluded be prioritized and included as well. According to currently available data, the efficacy of COVID-19 vaccines reduces over time, from 96.2% between seven days and two months after vaccination, to 83.7% by six months, including in preventing severe COVID-19. With the conclusion of the PPLTCP earlier this year, most senior living residents and caregivers have already passed or are approaching the six-month mark post-vaccination and are now at greater risk of becoming infected with COVID-19 and possibly facing more serious health effects as a result.



The PPPLTC was instrumental and critical in enabling the senior living sector to vaccinate both residents and staff. Most senior living operators do not have nurses on staff to directly administer vaccines, or the cold-storage capabilities required for maintaining vaccine inventories. These communities are also not set up to handle the reporting requirements or reimbursement associated with vaccine administration.

We know that vaccines are among the most critical resources for protecting this most vulnerable population, and that's why Argentum's Board of Directors recently offered its support for employers to mandate vaccinations for their senior living workforce. But we also know that more must be done to keep everyone safe. We welcome your partnership and sincerely appreciate your continued attention to the needs of seniors and their caregivers, particularly with reconstituting the PPLTCP as soon as possible to best prepare for the need to administer subsequent doses to this population most efficiently, and to ensure the AICP recommendations are again followed to prioritize these individuals.

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