



January 10, 2022

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

The Honorable Xavier Becerra
Secretary
U.S. Department of Health and Human Services
1401 Constitution Avenue N.W.
Washington, D.C. 20230

Dear President Biden and Secretary Becerra:

It is entirely unacceptable that nearly two years into the COVID-19 pandemic, America's seniors—those most vulnerable to this disease—continue to be left behind for critically needed support. With the Omicron variant now rampant and threatening the lives of millions of American seniors, including the nearly two million older Americans who call senior living home, we are imploring your administration to step up and ensure that they and their caregivers have the resources and support needed to keep everyone safe. Specifically, we are asking your help with: 1) directly supplying tests to senior living facilities; 2) assistance with vaccine/booster administration; and 3) targeted federal financial relief.

We are writing on behalf of the members of Argentum, the leading national non-profit association representing over 70 percent of senior living facilities. Our members operate assisted living, memory care, independent living, and continuing care communities, which serve as the homes for one in four older Americans who need assistance with daily living. Their caregivers have been working tirelessly to keep everyone safe, remaining on the frontlines of this crisis for the past two years as they've provided 24-7 round-the-clock care for seniors who are the most at-risk of COVID-19, with an average age of 85 and many suffering from multiple comorbidities. Unfortunately, these caregivers have consistently not had access to necessary support or resources, which are even more critically needed now.

The most critical tools for mitigating the spread of COVID-19 and protecting residents and staff are testing, vaccines, and boosters. The vaccines have been an integral part of keeping everyone safe, and senior living facilities have been proud to do their part to achieve very high levels of vaccination—an industry survey we conducted last month showed resident vaccination rates of 95.5% and staff vaccination rates of 87.6%. These rates have been possible due previous support programs led by the CDC, which earlier this year helped with administration of the first series of vaccines to residents and staff. Unfortunately, this program was not resumed for the administration of boosters, which placed enormous burdens on providers to vaccinate a largely non-ambulatory population unable to travel to outside clinics.

While vaccines and boosters are helping to reduce some severe infections, unfortunately, the data show that more than two-thirds of breakthrough hospitalizations among fully vaccinated individuals are occurring in those who are age 65 and older. This is why testing is so critical for providers to better track and mitigate the spread of COVID-19 within these congregate care

settings. The rapid tests that were supplied by HHS directly to communities throughout the pandemic had been an enormous help in rapidly identifying cases and allowing communities to quickly contain the spread. Unfortunately, due to the fast spread of the Omicron variant, these supplies have been depleted.

Tests are critically needed by senior living providers as local health jurisdictions are requiring routine use of rapid tests in outbreak situations, often including negative tests to be repeated every two days. With the current shortage of tests, this practice is not sustainable. Further, state and local public health departments have varying guidance, including required testing strategies that make it difficult to forecast testing needs. Senior living communities could end up without the necessary resources to test as directed by public health officials.

While we appreciate the CDC's recent guidance for healthcare personnel to allow asymptomatic staff to return to work sooner with a negative test, including vaccinated staff to return to work in five days with a negative test, ultimately this is not a realistic option with the shortage of test supplies. Senior living operators critically need frontline workers to return to work as quickly as possible, as workers whose return is delayed only exacerbates the staffing shortages that have worsened over the course of the pandemic, as more than 380,000 caregivers have left the industry. Unless providers can get the needed testing supplies, many of our most vulnerable will be at risk of not being able to receive the care they need simply due to the shortage of caregivers able to be tested.

The data clearly show that seniors are the single most vulnerable population to COVID-19: nearly 80 percent of all COVID-19 deaths in the U.S. having occurred in people over the age of 65. Unfortunately, time and again, America's seniors have been left behind for COVID-19 support. It took six months into the pandemic for their caregivers to even have access to federal relief, and still that relief is substantially less than other providers who aren't serving on the frontlines have received. Similarly, testing supplies have consistently been inadequate and unavailable to properly track and mitigate the spread and resume necessary staffing levels, and we critically need a resumption of the federal support program for vaccine and booster administration. Additionally, providers were inexplicably left behind in landmark legislation, including the American Rescue Plan Act and the currently under-consideration Build Back Better Act.

For these reasons, we are urging your administration to ensure that older Americans are not left behind again by:

1. **Distributing COVID-19 tests directly to senior living facilities.** Your administration has committed to making rapid tests available to Americans in the home, yet that commitment was not extended to congregate senior housing where it's needed most, and where nearly two million older Americans call "home." In addition to ensuring adequate staffing with return-to-work protocols and to better inform and control the spread of COVID-19 within communities, these tests also support visitation. As we learned last year, visits—especially from family members—are essential for the mental and emotional well-being of residents, and we must do everything possible to avoid the unintended consequences of physical and social isolation that were so devastating in the early days of the pandemic.

2. **Resuming federal support programs for vaccine/booster administration.**

Vaccines have proven very effective at reducing severe infections, but we also know that their efficacy declines over time and that seniors remain the most at-risk when efficacy wanes. As we continue to mitigate the spread of variants, we know that boosters will be needed on a recurring basis moving forward, and that seniors and their caregivers must be prioritized in this process. This is particularly true for those in senior congregate care facilities who are non-ambulatory and unable to travel to offsite clinics. And while 90% of communities have completed initial booster clinics as of December 2021, this was tremendously time-consuming at a time when clinical staffing is scarce. The CDC previously supported a public-private partnership program to establish and administer vaccine clinics to millions of seniors in congregate settings, which proved highly successful and should be replicated for additional phases of vaccines and boosters.

3. **Prioritizing the remaining Provider Relief Funds for assisted living providers.**

While we appreciate that additional relief is being made available through the current Phase 4 of the provider relief fund (PRF), it is simply inadequate to offset the more than \$30 billion in expenses and losses that assisted living providers have incurred in COVID-19 related losses due to PPE, testing, cleaning, staffing needs and hero pay, as well as record-low occupancy rates. Through Phase 3 of relief, assisted living providers have received less than half of one percent of the PRF, and Phase 4 of relief only offsets 20-25% of most providers' losses for the time periods where their losses were the greatest.

We are increasingly concerned that many providers will be unable to weather the ongoing challenges of the pandemic much longer if they don't receive necessary support, potentially leaving them with no other option than to close their facilities, which unfortunately, many have already had to do. Senior living communities are not like restaurants, hotels, or other venues. They are the places where seniors and their loved ones have chosen to call *home*. They urgently need your help. Please do everything in your power to ensure they have the testing resources, additional support for vaccine/booster administration, and financial relief that are so critically needed for this most vulnerable population.

We would welcome the opportunity to partner with the administration on any of these efforts and to further discuss how best to support these frontline caregivers and the vulnerable seniors they serve. Thank you for your consideration.

Sincerely,



James Balda
President & CEO
Argentum