



February 8, 2021

Rochelle Walensky, MD, MPH  
Director  
Centers for Disease Control and Prevention  
1600 Clifton Road  
Atlanta, GA 30329

Dear Dr. Walensky:

Congratulations on your appointment as Director of the Centers for Disease Control and Prevention (CDC). The expertise and leadership you bring to this agency is respected and appreciated as you work to implement the Administration's strategy to create a responsible and effective COVID-19 response. As you continue to take steps to enhance COVID-19 vaccine production and distribution strategies, please consider the needs of the senior living industry that is fighting this public health crisis on the front lines to keep almost 2 million seniors and 1 million staff safe in communities across the country.

**We have great concerns that many of our residents have not yet been able to access the vaccine and we urge your attention and assistance to address what we believe to be a serious oversight in the federal guidance provided to the Long-Term Care (LTC) Pharmacy Program.**

When CDC adopted their COVID-19 Vaccine Prioritization, they included Long Term Care residents and Health Care professionals in the 1a grouping. Most of the states have adhered to this recommendation and are making progress in vaccinating residents and the staff of long-term care facilities including assisted living and nursing homes, under the LTC Pharmacy Program.

However, not all vulnerable seniors living in congregate care settings are being prioritized in this grouping or in subsequent priority groups. Limiting the LTC Pharmacy Program to only skilled nursing homes and assisted living communities, overlooks seniors in similar congregate care settings in their 80's who are among those most vulnerable to contracting COVID-19 and the staff who serve them. These settings are "Independent Living" communities, many of which are co-located with assisted living and nursing homes as well as stand-alone communities that should be included under the umbrella of long-term care and therefore the LTC Pharmacy Program.

CDC states on its website, *"Making sure LTCF residents can receive COVID-19 vaccination as soon as vaccines are available will help save the lives of those who are most at risk of dying from COVID-19. The communal nature of LTCFs and the population served (generally older adults often with underlying medical conditions) puts facility residents at increased risk of infection and severe illness from COVID-19."*

This statement underscores the need for all congregate care settings to have access to this vaccine. Further, it is critical the vaccine be available through a clinic in their communities such as those the LTC Pharmacy Program conducts. In most cases these residents are not able to manage the tedious registration, scheduling, transportation, and follow-up process required to compete with younger population groups such as those 65 to 75 years of age and older.

As the following data (attached) from **ATI Advisory** demonstrates:

- Independent living residents are as old as residents of assisted living and nursing homes (82.8 years)
- Independent living residents have a similar number of comorbidities as assisted living and nursing home residents (69% have 4 or more comorbidities)
- Independent living residents have high uptake of flu vaccination (higher than SNFs, AL, Home, and Sect 202)

The most efficient delivery mechanism to reach this population is through the LTC Pharmacy Program. As such, it is critical that CVS, Walgreens, and other participating pharmacies adjust their operational plans to include this population of seniors and staff in their clinics. We urge you to update the CDC strategy and direction to the Pharmacy Program partners.

The COVID-19 vaccine has finally allowed us to see some light at the end of this very long tunnel. However, with January as the deadliest month of this pandemic to date and new variants of coronavirus spreading that are more contagious, the need for action to mitigate the risk to seniors living in these settings is critical.

Thank you for your time. If you have any questions, please reach out to Jeanne McGlynn Delgado, ASHA's VP of Government Affairs at [jeanne@seniorshousing.org](mailto:jeanne@seniorshousing.org). I look forward to working together to address these issues.

Sincerely,



David Schless  
President

#### ABOUT ASHA

ASHA is the leading national association exclusively dedicated to supporting companies operating professionally managed, resident-centered and predominately private pay senior living communities. Our member companies offer the full range of senior living communities including independent living, assisted living, memory care, and continuing care retirement communities. ASHA represents over 550 companies who collectively own and operate more than 700,000 units across the country.