



February 2, 2021

The Honorable Diana DeGette, Chair
House Committee on Energy and Commerce
Subcommittee on Oversight and Investigations

The Honorable Morgan Griffith, Ranking Member
House Committee on Energy and Commerce
Subcommittee on Oversight and Investigations

Dear Chair DeGette and Ranking Member Griffith:

Thank you for convening this hearing on this most important topic of distribution and administration of the COVID-19 vaccine. The American Seniors Housing Association (ASHA) respectfully submits this letter for the record, to share our views and recommendations as you address these issues in this hearing: **NO TIME TO LOSE: SOLUTIONS TO INCREASE COVID-19 VACCINATIONS IN THE STATES.**

ASHA represents over 550 companies who own and operate the full spectrum of senior living, including Independent Living, Assisted living, Memory Care and Continuing Care Retirement Communities (CCRCs). Our members have served on the front lines of this pandemic from the beginning to keep their residents and staff safe from COVID-19 and appreciate the opportunity to share our views on the COVID-19 vaccine rollout as it impacts those living and working in our communities as well as our ability to operate safely. Our overall message which we describe in greater detail below is this:

All senior living settings must be included in the Long-Term Care (LTC) Pharmacy Program to ensure safety and create much needed efficiencies in the vaccine distribution strategy for older adults. This is especially critical as new variants of the virus are surfacing, creating a more infectious and dangerous environment. Policymakers must ensure that this population is vaccinated before expanding access to younger populations such as 65 and older. The best way to do this is through on site clinics such as those under the LTC Pharmacy Program.

Our members can attest to the challenges of keeping a community safe. Until a vaccine is available in every senior living setting, there is no ability to maintain a zero-risk environment in communities where staff must come and go every day and interact with residents who are the most susceptible to contracting the virus. The message that "help is on the way" was underscored when HHS and DoD announced agreements with CVS and Walgreens to provide and administer COVID-19 vaccines to residents of long-term care facilities (LTCF) nationwide including senior living, with no out-of-pocket costs. This announcement stated, "Protecting especially vulnerable Americans has been a critical part of the Administration's work to combat COVID-19, and LTCF residents may be part of the prioritized groups for initial COVID-19 vaccination efforts until there are enough doses available for every American who wishes to be vaccinated." Our members have enrolled in this program and were encouraged that they will soon see some relief from the nightmare that has taken so many lives in our communities and other long term care facilities across the country.

While the LTC Pharmacy Program includes assisted living and nursing homes, it came as a shock and disappointment when operators of independent living communities were denied access to these clinics. The recent decision to include residents of CCRCs is much appreciated and should in turn address many of the IL residents living in these settings, but even then, access has been uneven. Further, this addition does not address those seniors living in an independent living setting that is not part of a multi-level community (approximately 400,000 residents) and to date, these settings have received very little assistance in gaining access to the COVID-19 vaccine. State governors and state and local health departments have employed various disbursement strategies with little evidence they are aware of this segment of their populations that are at risk of falling through the cracks especially as they expand the eligible population age groups to younger populations such as 65 and older.

The LTC Pharmacy Program should be expanded to include all vulnerable seniors living in congregate care settings including independent living settings, which are currently being overlooked. It is critical that this directive be instituted in federal and state plans before access is expanded to younger age groups. These seniors are the most at risk of contracting and dying from the virus and should be given priority status until supply of vaccine is significantly ramped up.

Please consider the following:

- The average age of residents living in independent living and assisted living is 82 and 85, respectively.
- The LTC Pharmacy Program does not include all senior congregate care settings. Independent Living residents MUST be included in this program before expanding access to younger populations or they will be overlooked.
- If these residents must compete with 65-year-olds for access, they will be seriously disadvantaged. It is very difficult for these older seniors to manage for themselves scheduling, record keeping, transport and monitoring of side effects if forced to seek vaccination at a local arena or parking lot clinic. The clinics must come to them.
- The LTC Pharmacy Program is the most efficient and safe way to get this vaccine to all seniors living in congregate care settings, including assisted living and independent living in addition to nursing homes.
- As health care professionals, all those working in congregate care settings must also be vaccinated. They work closely and intimately with residents every day. All efforts to keep staff members safe so they can continue to serve on the front lines over the next several months as this virus surges across the country must be pursued.
- Consideration must also be given to mandating the vaccine for these employees. We are amid a public health crisis and vaccine hesitancy among staff who work closely with seniors risks the lives of all who work and live in these communities. Voluntary participation is always the goal. However, we urge consideration of policies that our industry can rely on to ensure that all our collective efforts to address this crisis are not undermined by unvaccinated staff.

The senior living industry is committed to continuing to do whatever it takes to keep our residents and staff safe. With the tools to keep people safe and out of the hospital,

senior living residents, staff, and the overall health care system benefits. We look forward to working with you to achieve these goals. Please feel free to reach out to Jeanne McGlynn Delgado at jeanne@seniorshousing.org with questions.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "David Schless".

David Schless
President

Cc: House Energy and Commerce Chairman Pallone and Ranking Member McMorris Rogers
Members of the House Energy and Commerce Subcommittee on Oversight and Investigations