



September 11, 2020

The Honorable Alex M. Azar Secretary U.S. Department of Health and Human Services 200 Independence Avenue, S.W. Washington, DC 20201

Dear Secretary Azar:

On behalf of the senior living industry, Argentum and the American Seniors Housing Association (ASHA), ask your assistance to ensure that senior living residents and staff receive priority access to the COVID-19 vaccine once developed, as well as the appropriate resources needed for a wide-scale distribution to their senior populations.

Our member companies offer the entire spectrum of seniors housing – independent living, assisted living, memory care, and Continuing Care Retirement Communities (CCRCs). Since February, our member operators and their senior living staff have been serving on the front lines of this pandemic, working tirelessly and compassionately to keep safe and engaged the two million residents who call "senior living" home and almost 1 million employees who care for them. We anxiously await the development of a safe and effective vaccine to keep both residents and the senior living workforce safe.

Last week, we were very encouraged by the Preliminary Draft Report provided by the National Academies of Sciences, Engineering and Medicine that assigns health care workers and highrisk seniors as recommended population groups for inclusion in Phase 1 in a four-phased approach to COVID-19 vaccine allocation. Argentum and ASHA submitted comments to support this recommendation but requested that more specificity be included in a final report to ensure that senior living residents and employees are included in these stated groups. The report includes terms such as congregate care, residential care facilities, assisted living, long term care, nursing homes and skilled nursing homes but it is critical that when finalizing the report relative to the Phase 1 population groups, it is clear that the **senior living community residents and employees** are expressly included in these groupings.

**The Senior Living Resident:** This senior population is at higher risk than other older adults for COVID-19 infection, death, and other poor outcomes related to isolation and lockdowns. As the committee noted, as of August 1, nearly 80 percent of all COVID-19 deaths in the U.S. have occurred in people over the age of 65, which makes them among the most vulnerable groups when determining a vaccine distribution plan. Senior living residents have a significant need for assistance with daily living tasks putting them in contact with direct care workers, which increases their risk of transmitting infection. Their higher- than- average age and presence of chronic conditions puts them at higher risk of death. And preventative measures, such as lockdowns and isolation, are accelerating functional and cognitive decline among this population, leading to poor health outcomes. Protecting older adults, including those in senior living communities and the senior living workforce, must remain among the highest priorities in the vaccine distribution plan.

**The Senior Living Workforce:** Our heroic staff have been serving on the front lines of this pandemic, caring for our seniors, risking their own health for the welfare of the seniors they serve. These caregivers, nurses, housekeepers, dining staff and others interact with the residents daily, placing themselves in danger of either contracting the disease themselves and further risk infecting their families and loved ones at home. Due to lack of rapid testing capability, the asymptomatic individual can carry and transfer the virus to the resident populations and possibly create an outbreak in the community The consequences for each of these scenarios is dangerous and can be mitigated once a vaccine is developed and distributed.

Our vulnerable seniors must have priority. We implore that you ensure that senior living residents and staff have priority access to the COVID-19 vaccine as well as the resources needed to provide a wide-scale distribution of the vaccine. Our seniors deserve no less.

We look forward to discussing the need for senior vaccine priorities and would like to meet to discuss these urgent needs.

Sincerely,

James Balda President & CEO Argentum

David Schless President American Seniors Housing Association