



January 7, 2021

Dear Governor:

As you continue to finetune your prioritization distribution plans for the COVID-19 vaccine, I want to call your attention to a residential setting within the long-term care population of seniors which if not addressed in the initial 1a groups is at great risk of being overlooked. These are the senior residents of Independent Living. ***For reasons stated below, I encourage you to review your state plans relative to the long-term care populations and adjust them to expressly include Independent Living residents and staff as Priority 1a, along with the other long term care settings. They should receive vaccines under the LTC Pharmacy Program along with those living in nursing homes and assisted living, especially if they are part of a multi-level care setting. It is becoming more critical as we are seeing growing cases of this new strain of virus that is more contagious and especially dangerous to seniors living in these settings.***

As you know, when the ACIP adopted their interim recommendations on Dec 1 regarding 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 currently moving forward to vaccinate residents and the staff of long-term care facilities under the LTC Pharmacy Program which is consistent with the federal guidance.

However, we are concerned that not all vulnerable seniors living in congregate care settings are being prioritized in this grouping. Long-term care facilities are currently being interpreted to include only skilled nursing facilities and assisted living communities. This strict definition risks overlooking seniors who are in their 80's for early vaccine access who are among those most vulnerable to contracting COVID-19. These settings are "Independent Living" communities, many of which are co-located with assisted living and nursing homes as well as standalone communities and should be included under the umbrella of long-term care.

Most of the long-term care settings are working with the CVS/Walgreens Partnership Program which is a very efficient method for vaccine distribution to this population of seniors. In fact, early HHS communications encouraged all senior living settings to register for this program. However, it has come to my attention that in many states, residents of Independent Living are being denied access to the vaccine even as clinics are being set up in multi-level communities where residents of assisted living and skilled nursing and their staff are being vaccinated. This is not only inefficient but disregards this population of at-risk seniors and their staff for early access to the vaccine, which can threaten the overall health of the community.

The most efficient delivery mechanism 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 send that message to CDC.**

The COVID-19 vaccine has finally allowed us to see some light at the end of this very long tunnel. We appreciate the task ahead of you to see that it is equitably distributed. We are not asking to jump ahead of any other prioritized population but rather recognize this group of vulnerable seniors and their staff under the LTC Pharmacy Program so that they are not inadvertently overlooked for early access.

Thanks for your time.

Sincerely,

A handwritten signature in black ink, appearing to read "David Schless". The signature is fluid and cursive, with the first name "David" and last name "Schless" clearly distinguishable.

David Schless  
President  
American Seniors Housing Association

CC: State Departments of Health