



February 10, 2021

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

## **DELIVERED VIA EMAIL**

Dear Dr. Walensky,

Thank you for your leadership in helping to prioritize long term care residents and staff for the COVID-19 vaccine. The American Health Care Association and National Center for Assisted Living (AHCA/NCAL), representing more than 14,000 nursing homes and assisted living communities across the country that provide care to approximately five million people each year, appreciates the CDC's efforts to both expeditiously and methodically vaccinate our unique population.

Facing an unprecedented and monumental task, the CDC's pharmacy partnership program for long-term care has been a great success. This reflects the hard work and commitment of your agency to ensure that vaccinations in long term care are efficient and effective.

Since the beginning of the pandemic, we have also appreciated the CDC's rapid development of guidance on infection control practices to prevent the spread of COVID-19, which has been devastating to long term care residents and staff. This guidance, which included restricting visitors and group activities, was necessary to help save as many lives as possible, as the virus uniquely targets our residents—primarily older adults with multiple chronic conditions. However, now with millions of our residents and staff getting vaccinated, we hope to see swift changes to the current guidance in order to improve the quality of life for our residents.

To achieve this goal, we ask for CDC's support to rapidly evaluate the vaccines' effectiveness among the long term care population in both preventing spread and in reducing morbidity and mortality. We understand the clinical trials only evaluated the effectiveness in preventing symptomatic disease and severe illness, and participants did not include long term care residents. Therefore, further study is needed on the vaccines' impact on transmission and our population before revising guidance to long term care settings. We support this approach; however, we ask that the CDC expedite this evaluation of the vaccines in order to bring clarity to states, providers, residents and family members as soon as possible.

Fortunately, <u>preliminary analysis</u> by AHCA/NCAL suggests that the vaccines may be as effective as we hoped. Our research division, the Center for Health Policy Evaluation in Long Term Care (CHPE), found that COVID-19 cases decreased at a faster rate among nursing homes that had completed their first vaccine clinic, compared to nearby nursing homes that had not yet administered the vaccine. More specifically, the CHPE analysis found:

- Vaccinated nursing homes experienced a 48% decline in new resident cases three weeks
  after the first clinic, compared to a 21% decline among non-vaccinated nursing homes
  located in the same county.
- Similarly, new staff cases declined by 33% in vaccinated nursing homes compared to 18% in non-vaccinated facilities.

While encouraging, further study is needed to determine if these trends will continue in subsequent clinics or after the second dose of the vaccine. We ask that data and funding be made available to the research community to expedite this ongoing analysis.

AHCA/NCAL stands ready to assist the CDC in this effort. We can facilitate data sharing between providers and researchers as well as connect with experts from the public and private sector to assist with data waiting to be evaluated.

The need for urgency on this matter is painfully evident. For nearly a year, long term care residents have been unable to visit with their loved ones in-person or participate in enriching social activities. Despite our staff's heroic efforts to keep residents engaged and fill the void of family members, we are deeply concerned that the prolonged isolation of our residents is impacting their health and wellbeing. Prioritizing research on the vaccines' effectiveness among our population would help ensure these facilities can swiftly and safely reopen, improving the lives of our vulnerable seniors.

Meanwhile, with millions of residents and staff receiving their second doses, many states have begun to explore reopening strategies. State governments play a vital role in contributing to the protection of our residents and staff during this time. However, in this situation, we believe that cohesion is needed to ensure effective outcomes. Without guidance from the federal government, states may create confusing or inconsistent practices.

Since ongoing evaluations are needed, we recommend that CDC reiterate the rationale for current guidance to states, providers, residents and families as soon as possible, as well as outline what is needed in order to modify existing guidance. Clear communication with stakeholders can help ensure everyone understands the continued need for vigilance until we know more about the vaccines' effectiveness.

Thank you again for your leadership. The CDC has made an immeasurable difference in the lives of all Americans during this unprecedented time. Perhaps next to you, no one could wish for an immediate end to the pandemic than those who live and work in long term care. We look forward to working together to protect our residents while still offering the highest quality care.

Sincerely,

Mark Parkinson

President & CEO, AHCA/NCAL