



January 28, 2021

Dr. Rochelle P. Walensky
Director, The Centers for Disease Control and Prevention

Mr. Jeffrey Zients
COVID-19 Coordinator

Dr. Bechara Choucair
COVID-19 Vaccine Coordinator

Dear Dr. Walensky, Mr. Zients and Dr. Choucair,

LeadingAge and the Visiting Nurse Associations of America (VNAA) look forward to working with the Biden-Harris Administration. We are writing to ask you to take steps to ensure that **all** older adults living in communal living settings, including the “independent living” (IL) residents of life plan communities (LPCs), are provided with COVID-19 vaccinations during the on-site Pharmacy Partnership for Long-Term Care clinics.

Specifically, we ask that:

- The CDC recommendation that LPCs (or continuing care retirement communities – CCRCs) are eligible entities in the Pharmacy Partnership for Long-Term Care Program be amended to make clear that IL residents within LPC campuses are included within this eligible population.
- This clarified statement on eligibility be communicated with all states as well as the Program’s participating pharmacy partners.
- If a state agrees to include IL on an LPC campus, the pharmacy partner must immunize people in IL on LPC campuses.

LeadingAge and the VNAA represent more than 5,000 nonprofit aging services providers and other mission-minded organizations that touch millions of lives every day. Our membership encompasses the continuum of services for people as they age, including those with disabilities. We bring together the most inventive minds in aging services to make America a better place to grow old.

Right now, older adults and the providers who serve them are at the center of the pandemic storm. Eighty percent of all COVID-19 deaths are among people aged 65 and older. Individuals living in congregate residential settings, including in LPCs, are at particularly high risk.

Life plan communities are communal living settings that offer levels of care for all stages of the aging experience: independent living, assisted living, nursing, and memory care. Approximately **650,000** older adults live in LPCs, and of those, **the majority, or roughly 391,000, live in independent living**. Despite the terminology, many in IL are older and frail; the average age is 86 years, and many have the comorbidities associated with higher risk of serious illness or death from COVID-19. Also, many IL older

adults live with functional challenges such as vision loss, hearing loss, mobility impairments, and early-stage cognitive impairment.

While we are very pleased that the staff and the assisted living (AL) and nursing home (NH) residents of LPCs are included in on-site Pharmacy Partnership vaccination clinics, many states or pharmacy partners have excluded the IL older adults who live in the same campus, even when governors have asked them to include those in IL and provided sufficient doses. IL older adults use the same resources and spaces, and interact with the same staff, as do the AL and NH adults on the same campus. IL adults can just as easily be victims or carriers of the COVID-19 virus as their AL and NH peers. The exclusion of these IL adults from the on-site Pharmacy Partnership clinics has been profoundly distressing and confusing for both the older adults and the staff of these communal-living residences.

States are now expanding vaccination eligibility to adults 65 years or older at off-site clinics. We foresee significant vaccine access issues for the older, frailer IL adults of LPCs, who will have to compete for available appointments, will struggle with online scheduling, will have limited transportation options, will be unable to wait for hours in queue due to functional infirmities, and will be required to quarantine upon their return to the LPC where they live. IL older adults of LPCs are thus likely to be unable to participate, and thus be involuntarily excluded from receiving the lifesaving COVID-19 vaccine.

Notably, several governors have compassionately included IL older adults of LPCs in the on-site Partnership clinics, and we strongly urge you to require pharmacy partners to include IL residents in clinics in those states and clearly recommend that **all** states and participating pharmacies do the same, as soon as possible.

We look forward to your work to achieve the President's vaccination goals. We stand ready to help and want to be sure that this critical part of the aging services continuum is not left behind. Please contact Ruth Katz, LeadingAge senior vice president for policy (rkatz@leadingage.org), with questions or to set up a meeting to discuss these issues further.

Sincerely,

A handwritten signature in black ink that reads "Katie Smith Sloan". The signature is written in a cursive, flowing style.

Katie Smith Sloan
President and CEO, LeadingAge
Acting President and CEO, Visiting Nurse Associations of America