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December 3, 2020

The Honorable Mike DeWine  
Governor of Ohio  
The Riffe Center  
77 S High St 30th Floor  
Columbus, OH 43215

**RE: Phase 1A Vaccine Distribution to the Home Care and Hospice Health Care Workforce**

Dear Governor DeWine,

Thank you for all of your leadership during the COVID-19 public health emergency. I write to you today in support of the CDC's Advisory Committee on Immunization Practices (ACIP) December 1 decision to prioritize health care workers for Phase 1A vaccine access, which includes providers of health care services in the home. These home care and hospice providers are on the frontlines of the pandemic caring for over 12 million of the nation's most at-risk individuals annually through over 3.5 million dedicated caregivers.

LeadingAge Ohio represents providers of long-term care across a number of settings, including providers who serve in the home care and hospice areas. The caregivers these providers employ include nurses, therapists, home health aides, hospice aides, personal care aides, home care workers, direct support professionals, among others. Home-based providers are working aggressively to prevent any spread of the virus from the community to their direct care professionals and the individuals they serve. Prioritizing vaccinations for our frontline health care staff and the high needs individuals we serve will be critical in achieving that goal.

Home care and hospice staff of all disciplines are properly included in the ACIP definition of health care workers although we want to note that some specific titles of these workers, as referenced above, may not be captured. Specifically, the ACIP's standards for "essential critical infrastructure workers" that defines health care providers<sup>1</sup> include:

- Healthcare providers including, but not limited to,...; nurses,...; assistants and aid[e]s;...; physical, respiratory, speech and occupational therapists and assistants; social workers...
- Home care workers (e.g. home health care, at-home hospice, home dialysis, home infusion, etc.).
- Home health workers (e.g., nursing, respiratory therapists, health aides) who...go into the homes of individuals with chronic, complex conditions and/or disabilities to deliver nursing and/or daily living care.

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<sup>1</sup> ACIP source: "Advisory Memorandum on Ensuring Essential Critical Infrastructure Workers Ability to Work During the Covid-19 Response," Cybersecurity and Infrastructure Security Agency (CISA), U.S. Department of Homeland Security, August 18, 2020.

- Personal assistance services providers to support activities of daily living for older adults, people with disabilities, and others with chronic health conditions who live independently in the community with supports and services.

The ACIP standards are reasonably consistent with a number of other state and federal standards defining essential health care workers. Universally, it has been recognized that health care in the home should be included in the Public Health Emergency priority actions. While it is obvious that nurses and therapists are health care workers and should be priority recipients of the vaccine, we wish to emphasize that those health care workers generally classified as home health aides, home care aides, hospice aides, personal care attendants, and direct support professionals are equally essential health care workers. This workforce is at higher risk of contracting and/or transmitting the virus because of the nature of the services they provide that are focused on assisting with Activities of Daily Living that put them in close contact with their patients for extended periods of time. It is therefore crucial that specific inclusion of this segment of the health care workforce be included as a first-line priority class of health care workers eligible for the vaccine.

We want to emphasize that the individuals served by these providers have complex service needs and are at high risk for COVID-19. While we recognize the need for vaccinations for those that live in long-term care facilities, it is important to remember that the workforce in home care and hospice, on a daily basis, frequently goes to multiple homes. They also provide care in other health care settings including nursing homes, assisted living facilities, and inpatient hospice facilities. The greater protection that both the workforce and individuals receive, the less likely there will be a community spread of the virus.

Further, due to the high-risk factors of the individuals served in their homes, many have been unable to see family members or leave their homes for any community activities for almost a year. Providing them access to a layer of protection through vaccination could make an immense difference in their immediate quality of life. Accordingly, the home care population should be afforded high priority status for access to the vaccine.

We recognize that the ultimate decision on prioritization of vaccine administration rests with the state and localities. We stand ready to assist you in any respect to provide the home care and hospice workforce with access to the vaccine.

Sincerely,



Kathryn L. Brod  
President/CEO

cc: Ohio Department of Aging Director Ursel McElroy  
Ohio Department of Health Director Stephanie McCloud