

# WHCA / WiCAL

Wisconsin Health Care Association

Wisconsin Center for Assisted Living

**DATE:** December 11, 2020

**TO:** State Disaster Medical Advisory Committee (SDMAC)  
Vaccine Distribution Subcommittee

**FROM:** Rick Abrams, President & CEO  
Wisconsin Health Care Association  
Wisconsin Center for Assisted Living

**RE:** Public Comment on Draft Document: *Recommendations for the State of Wisconsin on Distributing COVID-19 Vaccine Allotments in Phase 1a*

To Whom it May Concern:

Thank you for the opportunity to submit public comments on behalf of our skilled nursing facility (SNF), assisted living facility (ALF), and home care provider members across the state of Wisconsin.

The Wisconsin Health Care Association and Wisconsin Center for Assisted Living (WHCA/WiCAL) is a non-profit organization dedicated to representing, protecting and advancing the interests of Wisconsin's long-term and post-acute care provider community and the residents they serve. WHCA/WiCAL represents providers from across the long-term care spectrum, including skilled nursing facilities, assisted living centers, and home care providers.

First, WHCA/WiCAL and our members thank the SDMAC for its commitment to creating an efficient and practical vaccine distribution plan. The process and planning is complex, and we are thankful for your leadership to ensure a timely and effective distribution of vaccines.

WHCA/WiCAL supports the inclusion of Health Care Personnel (HCP) and Residents of Long-Term Care Facilities (RLTCF) in Phase 1a. We also recognize that due to a limited initial supply, there will be a need to prioritize within Phase 1a recipients. Our continued request is that LTC be prioritized for vaccination, and that the Pharmacy Partnership for LTC be implemented as soon as possible. Early vaccination of HCP who work at LTC facilities is critical so that these individuals, who are mobile within their communities and work closely with LTC residents on a regular basis, are able to fulfill their duties with more confidence that they are protected, and also will be less likely to serve as a source of spread within an LTCF. Early vaccination of RLTCF will help protect our state's most vulnerable populations who are more susceptible to serious adverse health reactions to COVID-19, including death.

In relation to the numbered recommendations included on page 2 of the draft document:

- WHCA/WiCAL appreciates the need to minimize geographical disparities at the outset, but we also share a concern that administering less than the needed number of doses will require additional visits or follow-up actions by vaccinators and vaccinees, which will likely create logistical issues.
- WHCA/WiCAL supports the subcommittee's proposal for subprioritization among RLTCF based on medical vulnerability.
- WHCA/WiCAL supports the subcommittee's proposal to incentivize vaccinating entities to vaccinate unaffiliated HCPs. This will likely help address cold storage infrastructure concerns

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among facilities and will also allow for vaccination opportunities for other health care workers, including home care workers.

- WHCA/WiCAL understands the subcommittee’s current conclusion that, as COVID rates are high across the state, the vaccination distribution plan must have equitable geographic distribution at this point. However, WHCA/WiCAL requests that the vaccine distribution plan be sufficiently adaptive to allow for reevaluation of vaccine distribution based on need, as positivity rates and community spread levels change in communities or regions of our state over the next several months.
- While we understand the subcommittee’s perspective on not weighing current staffing shortages while considering prioritization of vaccines, we must emphasize that LTC staffing shortages have been exacerbated by COVID-19, and the faster that these workers can get vaccinated as a whole, the better for staff, providers, and residents. Again, we would ask that the distribution plan be adaptive to allow for changes to address future need after vaccine distribution is underway and as COVID-19 rates shift.

WHCA/WiCAL also supports the subcommittee’s draft document, *Recommendations for State of Wisconsin to Distribute a Multiple Dose COVID-19 Vaccine*. We support reliance on CDC guidance to ensure that the limited supply of vaccines is used as efficiently and practically as possible.

Once again, thank you for the opportunity to share the perspective of Wisconsin’s long-term care providers. Please do not hesitate to reach out to WHCA/WiCAL with any questions.

Sincerely,



**RICK ABRAMS**  
 President & CEO  
 Wisconsin Health Care Association  
 Wisconsin Center for Assisted Living