

Date

Honorable [Governor Name]

Address

City, State Zip

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

Governor [Name]:

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.

I am the owner of [Agency Name] in [City], and our professional caregivers are among the more than 3.5 million dedicated home care and hospice workers who are on the frontlines of the pandemic caring for more than 12 million of the nation's most at-risk individuals each year. 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.

Our national association, the Home Care Association of America, shared with us that 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 may not be captured. Specifically, the ACIP's standards for "essential critical infrastructure workers" that defines health care providers¹ 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.
- Personal assistance services providers to support activities of daily living for older adults, people with disabilities, and others with chronic health

¹ 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.

conditions who live independently in the community with supports and services.

The U.S. Bureau of Labor Statistics reports that as of March 2020 there were 3,525,381 health care workers providing services in individuals' homes². These health care workers are included under North American Industry Classification System (NAICS) classifications [621610 Home Health Care Services](#) and [624120 Services for the Elderly and Persons with Disabilities](#). These are the worker classifications that apply to the wide range of health care workers providing services covered by Medicare, Medicaid, TRICARE, VA, and the Older Americans Act along with long term care insurance, employer-based health plans, commercial health insurance, and consumer paid care.

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.

We want to emphasize that the individuals we serve often 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 our workforce, 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.

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,
[Name]

² Quarterly Census of Employment and Wages - Bureau of Labor Statistics, Private, [NAICS 621610 Home Health Care Services](#) and [NAICS 624120 Services for the Elderly and Disabled](#), All Counties, 2020 First Quarter, All establishment sizes.