



December 3, 2020

Dr. Rachel Levine, Secretary
Pennsylvania Department of Health
625 Forster Street
Harrisburg, PA 17120
Via Electronic Mail

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

Dear Dr. Levine:

On behalf of the Pennsylvania Homecare Association and our nearly 700 member agencies and their caregivers who continue to provide services to keep vulnerable Pennsylvanians safe in their homes, we thank you for your leadership during the COVID-19 public health emergency (PHE). We write to follow up on our November 15, 2020 letter, in light of the CDC Advisory Committee on Immunization Practices (ACIP) December 1 decision to prioritize health care workers for Phase 1A vaccine access, including home-based care providers. These homecare, home health and hospice providers are on the frontlines of the PHE, caring for more than 12 million of the nation's most at-risk individuals annually, through more than 3.5 million dedicated caregivers. Home-based care staff of all disciplines are properly included in the ACIP definition of health care workers for purposes of phase 1A, as they are in the city of Philadelphia's draft distribution plan and many state plans.

In the ACIP recommendations, home-based caregivers include nurses, therapists, home health aides, hospice aides, direct care workers providing personal assistance services, and more. Nationally, this provider sector is serving tens of thousands of patients with active COVID-19 infections, with more than 60% of home-based care providers reporting COVID-19 infected patients and consumers. These providers are actively working to prevent any spread of the virus from the community to their caregivers and the individuals they serve. Prioritizing vaccinations for these frontline care staff and the high needs individuals they serve will be critical in achieving that goal.

As you know, Pennsylvania's COVID-19 Interim Vaccination Plan (Interim Plan) identified healthcare personnel, first responders, critical workers and individuals with high-risk conditions as prioritized during Phase 1 of the COVID-19 vaccine distribution. In Phase 1A, the Interim Plan prioritizes high risk services and activities performed by healthcare personnel, defined as "administration of medication, toileting, bathing, feeding, wound care, turning/repositioning, immunizations." Many of these activities are performed by home health, homecare and hospice providers, both medical and non-medical. Despite this language in 1A, however, the Interim Plan also provides that home health workers are in Phase 1B of vaccine distribution.

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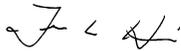
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We respectfully request that the Department expressly include all of these home-based care providers in Phase 1A of distribution and want to emphasize that caregivers such as home health aides, home care aides, hospice aides, and direct care workers providing PAS are equally essential health care workers. This workforce is at high risk of contracting the virus because of the nature of the services they provide, including assisting with Activities of Daily Living, putting them in close contact with their patients and consumers for extended periods of time. It is crucial that this segment of the health care workforce be clearly identified as a first-line priority class of health care workers eligible for the vaccine. They were appropriately classified as essential, life-sustaining businesses when business shut-down orders were issued in the Spring.

As you are also aware, the individuals served by home-based care providers often have complex needs and are at high risk for COVID-19. While we certainly recognize the need for vaccinations for those in long-term care and acute care facilities, it is important to note that our workforce often goes to multiple homes in a day. They also provide care in a range of health care settings, including nursing homes, assisted living facilities, and inpatient hospice facilities. The greater protection that both this workforce and individual care recipients receive, the less likely there will be further community spread of the virus.

Thank you in advance for your time and consideration. Please contact me at (717) 649-6498 or thenning@pahomecare.org if we can provide any additional information. We welcome any opportunity to assist you with the issues surrounding vaccine distribution, including sharing any Department communications relating to distribution.

Sincerely,



Teri L. Henning
Chief Executive Officer

cc: Meg Snead, Secretary of Policy and Planning, Office of the Governor
Meaghan Abbott, Director of Intergovernmental Affairs, Department of Health
Linda Chamberlain, Director, Department of Health, Division of Home Health