Dear Drs. Lee and Cohn,

We appreciate the focus the CDC, through the Advisory Committee on Immunization Practices (ACIP), has given to the issue of COVID-19 vaccine boosters and additional doses. We write to you today to urge all due speed in reviewing the available data and developing a recommendation for our extremely vulnerable nursing home population as soon as possible.

AMDA – The Society for Post-Acute and Long-Term Care Medicine (AMDA) is the only medical specialty society representing the community of over 50,000 medical directors, physicians, nurse practitioners, physician assistants, and other practitioners working in the various post-acute and long-term care (PALTC) settings. The Society’s 5,500 members work in skilled nursing facilities, long-term care, and assisted living communities, CCRCs, home care, hospice, PACE programs, and other settings.

Our concern for speed stems from several factors specific to the nursing home patient and resident population. Principally, regardless of other immune-compromising conditions, nursing home residents have immune senescence and therefore have a less adequate response to vaccines.\(^1\) Recent studies have pointed to waning of already poor immunity in PALTC residents.\(^2\)

Essential infection control practices in the nursing home are the same as they were before the administration of the vaccine in areas of high transmission. Unfortunately, despite these measures, the cases and hospitalizations due to...

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\(^1\) (Canaday, Carias, et al., 2021)
\(^2\) (Canaday, Oyebanji, et al., 2021)

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Our Vision:
A world in which all post-acute and long-term care patients and residents receive the highest-quality, compassionate care for optimum health, function, and quality of life.
COVID-19 infections reported in fully vaccinated PALTC residents have increased.

In addition, we are seeing a marked increase in COVID-19 positivity among fully vaccinated staff with the rise of the Delta variant, which leads to staff furloughs that further aggravate an already critical workforce shortage in many areas. This poses a dire and immediate threat to patient safety. Unlike other healthcare settings, there are additional negative consequences specific to PALTC settings. When nursing home staff test positive for COVID-19, this often requires residents to be quarantined, and this isolation significantly worsens our residents’ mental and physical health and disrupts person-centered care.

The disproportionately high number of serious breakthrough infections and hospitalizations in nursing home residents and the emerging data is compelling. Our Infection Advisory Subcommittee believes there are sufficient data to surmise that the potential benefits of proceeding with COVID-19 booster shots in nursing home and other congregate care settings for elders far outweigh any risks, especially in the current crisis due to delta variant. Failure to promptly recommend these boosters in these patients has the potential to further increase the devastation COVID-19 has wrought in our facilities.

For these reasons, we believe that fully vaccinated nursing home residents are at immediate and increased risk and should be afforded the same protection as other patient populations who are immune compromised. We strongly request that nursing home residents once again be appropriately placed among the high-priority groups to receive a COVID-19 vaccine booster. We ask the ACIP to review the relevant data urgently and to come to an affirmative recommendation on boosters as rapidly as possible.

Please reach out to our Executive Director, Christopher Laxton, at claxton@paltc.org with any questions or follow up. Thank you for your important work, and for your consideration.

Sincerely,

Karl E. Steinberg, MD, HMDC, CMD
President