



December 11, 2020

The Honorable Andrew Cuomo  
Governor  
New York State Capitol  
Albany, New York 12224

Re: NYS COVID-19 Vaccination Administration Program

Dear Governor Cuomo,

Collectively, our three organizations write to you as one voice in support of prioritizing home care workers in your COVID-19 Vaccination Administration Program (program). We have reviewed your plan in detail, and we share many of your concerns regarding the equitable, fair, and medically appropriate roll-out of the limited vaccine supply here in New York.

The New York State Association of Health Care Providers (HCP), the Home Care Association of New York State (HCA) and Leading Age New York all represent home care providers across New York State.

**Vaccination of the Home Care Workforce**

As such, we strongly urge the inclusion of home care workers in the Phase One COVID-19 vaccination roll-out. As outlined in the program, Phase One will initiate the vaccination of healthcare workers (clinical and non-clinical) in patient settings.

During the December 1 meeting of the Advisory Committee on Immunization Practices (ACIP), a policy prioritizing health care personnel along with long term care residents was adopted by a nearly unanimous vote. Multiple times throughout this meeting, home care was referred to as an integral sector of the health care continuum. In fact, the [presentation slides](#) specifically list home care in the defined healthcare groups for Phase 1a vaccination. Other states have already explicitly named home care workers as priority recipients of early COVID-19 immunizations.

Similarly, during the December 4, COVID-19 Vaccination Oversight hearing in the New York City Council, home care was repeatedly cited by participants as being crucial providers to protect from the virus in order to avoid spread during the pandemic. During the course of the jointly held public hearings by the Committee on Health and the Committee on Hospitals, home care was recognized as a critical component of the health care workforce in the five boroughs. Half a million patients/families are served by home care in this state, with well over 100,000 home care workers in New York City alone.

Home care workers serve vulnerable and aged New Yorkers in their homes so they may successfully recover from or live with a wide range of health conditions. This work is critically



necessary to improve or maintain the health status of their patients and prevent hospitalization and/or readmission. Without home care, these patients would be in jeopardy of deteriorating health, necessitating a higher level of congregate care or hospitalization. This means precious hospital beds and resources would be unavailable for COVID patients, further straining the system. Additionally, healthcare costs would surely skyrocket. Therefore, vaccinating home care workers as essential members of the health care workforce is paramount to protecting at-risk patients and preserving New York's valuable healthcare resources.

Like other essential health care workers, home care workers are at risk of exposure to COVID-19 infection. These caregivers enter multiple residences each day, frequently traversing multiple cities or even counties. They interact closely with countless family members and other healthcare professionals during every shift. Especially in the urban areas, home care workers often must utilize public transportation several times a day in order to complete their assignments. They frequently serve complex patients in other, congregate settings, as well as individual homes. All of these factors increase the risk of exposure during this pandemic. While we understand that congregate care personnel and residents will be given the highest priority when a COVID-19 vaccine is available in the coming weeks, we implore you to also prioritize home care workers as part of the early vaccination in Phase 1 as immunization supply is made available.

### **Vaccination of Home Care Patients**

Our organizations and our frontline providers are equally concerned for the patients we serve and the medical fragility that puts the home care patient at high risk of COVID-19 morbidity and mortality.

Essentially by definition, the home care patient endures precisely the health conditions and comorbidities your task force recognizes as risk factors for a dangerous and/or life-threatening COVID-19 infection. These are New Yorkers with life-long diagnoses such as diabetes, heart failure, morbid hypertension, cancer, and chronic obstructive pulmonary disease who are managed at home by our member agencies. They may be recovering from heart surgery or pneumonia or other highly complex and unstable post-acute care. All these conditions are recognized as putting people at high risk of hospitalization, intubation, and death from COVID-19. Multiple diagnoses are additive for many of these patients; vaccination is imperative for their protection from this virus.

It is clear that the nature of the initial COVID-19 immunologic agents will require that distribution and administration will involve large immunization centers and events. Our member agencies are extremely concerned that homecare patients will be left out of early distribution efforts due to their limited ability to navigate their way to these locations. We advance that the needs of these patients be heavily considered in COVID-19 vaccine distribution planning. The mobile units discussed in the governor's plan might be the only solution for these homebound patients; we urge you to prioritize them accordingly.



## **Education**

Finally, our associations recognize the important role of patient and public education in improving vaccination acceptance by all New Yorkers. Vaccine hesitancy is especially a barrier for persons of color and those of lower socioeconomic standing. Many of our home care workers fit that portrait, as do their patients. We and our members stand ready, willing, and able to be a part of the enormous public health effort necessary for the success of your COVID-19 vaccination program. We will arm our members with educational materials for their workforces and for their patients. In that regard, when educational materials become available from the state, we look forward to ensuring that they are put to the highest use. It is only through public education that the healthcare industry can positively impact New Yorkers' decision to receive the COVID-19 immunization offered by this program. The home care industry will do its part, with the full understanding that the effort starts now, long before the approval and subsequent distribution and administration of any vaccine.

Now more than ever, home care is the component of the health care continuum that provides relief to the significantly overburdened healthcare system. The home care workforce deserves to have a principal place in your important phased roll-out of COVID-19 vaccinations. So, too, do the patients in our care.

Thank you for the opportunity to present the home care industry's comments and experience during the COVID-19 pandemic. We trust our insights from those in the field – insight that will ensure fair, equitable, and appropriate distribution of this historic vaccine – will well inform your important work.

We stand ready to partner with you during this process and to further discuss with you directly home care's critical role and contributions to the pandemic efforts, the ongoing needs of our caregivers and patients, and our dedication to the public's health.

Sincerely,

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