



California Association of Long Term Care Medicine
Promoting quality patient care through medical leadership and education

September 14, 2021

Lee Fleisher, MD
CMS Chief Medical Officer and Director of Center for Clinical Standards and Quality

Jean Moody-Williams
Deputy Director of Center for Clinical Standards and Quality

Dear Dr. Fleisher and Ms. Moody-Williams,

The California Association of Long Term Care Medicine's Delphi Group has been convening since the spring of 2020. Composed of national experts in geriatrics and long-term care medicine, the Group has previously published papers and promoted best practices related to testing and visitation.

The efforts that CMS have made on behalf of nursing home residents, particularly in relation to promoting person-centered care approaches, has been greatly appreciated. At the onset of the pandemic the need to protect vulnerable residents from the virus was paramount. Over time, the negative impact of social isolation has become painfully clear.

There is currently little empirical evidence that vaccinated visitors using appropriate infection prevention measures put residents or staff at significant risk, while evidence-based literature strongly suggests that social isolation causes direct harm to residents. The fact that for the past several months vaccinated visitors were often not allowed to see loved ones while unvaccinated staff continued providing direct care to these same high-risk individuals created a seriously dysfunctional and incongruous situation that is difficult to justify rationally.

The Delphi Group strongly supports vaccine mandates based on clinical evidence. It is also recognized that these mandates could exacerbate existing staffing shortages. The reality of nursing home workflow is that staff neither have the time nor should they have the added responsibility to "police" visitors by staying with them during a visit.

Summary and Recommendations:

- 1) The risk from vaccinated visitors using appropriate infection prevention measures to vaccinated nursing home residents is close to the normal pre-pandemic risk from various other infectious diseases.
- 2) The risk to residents of social isolation is substantial and has been well documented.

- 3) With existing staffing shortages that may worsen, there is a need for families to be able to visit loved ones and occasionally even be allowed to help with their care. This is of critical importance not only for the well-being of residents, but also for their family members and loved ones.
- 4) It is appropriate for nursing homes to ask visitors if they are vaccinated and to document their response.
- 5) Nursing home staff should not have the responsibility of “policing” visitors by staying with them during a visit.

The Delphi Group recommends that CMS should explicitly require facilities to allow vaccinated visitors to visit vaccinated residents as they could prior to the COVID-19 pandemic.

Thank you for your consideration of this matter. As always, we are available to discuss further.

Sincerely yours,



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