

***The following comments were delivered to the Committee on Equitable Allocation of Vaccine for the Novel Coronavirus, a group under the National Academies of Sciences, Engineering, and Medicine. The document was submitted on September 4, 2020 in response to a drafted framework for the distribution of COVID-19 vaccines.***

Committee on Equitable Allocation of Vaccine for the Novel Coronavirus,

As a provider of the Long-Term Care Ombudsman Program, we ask that you include Ombudsmen in Phase 1a of COVID vaccine distributions. Long-term Care Ombudsmen are advocates for residents of nursing homes, Assisted Living Facilities, and Residential Care Facilities. Ombudsmen are trained to resolve resident problems and assist with complaint resolution. Under the federal Older Americans Act, every state is required to have an Ombudsman Program that addresses complaints and advocates for improvements in the long-term care system.

Currently, the US has nearly 6,200 volunteer ombudsmen and 1,300 paid staff ombudsmen. Long-Term Care Ombudsmen are employed through local government and nonprofit organizations. Ombudsmen are not considered long-term care facility staff because it is important that they have the resident's best interest in mind. However, ombudsmen work just as close with long-term care residents as the facility staff, putting ombudsmen at high risk for contracting and spreading COVID-19. According to the Discussion Draft, Phase 1a should include "front line health care workers (in hospitals, nursing homes, or providing home care) who either: (1) Work in a situation where risk of SARS-CoV-2 transmission is high, or (2) are at an elevated risk of transmitting the infection to patients at high risk of mortality and severe morbidity". Long-term care ombudsmen fit both qualifications, and failing to include them in Phase 1a will have a deadly toll on long-term care resident lives and community infection rates.

It should be noted that (1) due to the extensive time commitment, volunteer ombudsmen are typically retired older-adults and therefore at high risk of infection, and (2) staff ombudsmen provide services to more than one nursing home, which heightens the risk of infection among facilities. Depending on geographical location and agency capacity, a staff ombudsman's caseload can cover hundreds of long-term care facilities and, commonly, staff ombudsmen visit 2-4 facilities each day.

COVID-19 nursing home lockdowns make the Ombudsman Program more important than ever before. It is critical that the thousands of staff and volunteer ombudsmen are included in Phase 1a. We hope that you will show your support for this program by including Long-term Care Ombudsmen in Phase 1a of the COVID-19 vaccine distribution. Thank you for your time and consideration.