



October 12, 2021

Dr. Cheryl Bettigole
Acting Health Commissioner
Philadelphia Department of Public Health
1101 Market Street
Philadelphia, PA 19107

Dear Acting Health Commissioner Bettigole,

On behalf of the Pennsylvania Health Care Association (PHCA) and the Philadelphia-area nursing homes, assisted living communities and personal care homes we represent, I am writing to express serious concerns regarding the Philadelphia Department of Public Health's impending COVID-19 vaccine mandate.

Long-term care providers, workers, and residents have remained the epicenter of the COVID-19 pandemic since March 2020. But the challenges facing the sector, including a dire workforce shortage, have now reached crisis levels, creating difficulties in meeting the high demand for critical care for tens of thousands of senior citizens.

Since the beginning of the COVID-19 vaccine rollout in Pennsylvania, PHCA and our members have urged all residents and workers to get vaccinated, and we continue to educate and provide information – as well as dispel misinformation – regarding the vaccine.

The data is clear: there is no better example of the positive impact of the COVID-19 vaccine than in long-term care communities, especially as case counts have dramatically decreased over the past six months. To date, 85% of all residents in Philadelphia nursing homes have been vaccinated.

However, even with our collective efforts, a portion of the long-term care workforce remains unvaccinated. And, unfortunately, those workers may be forced to leave their positions in just four days.

It is our understanding that frontline healthcare workers who do not receive at least the first dose of the COVID-19 vaccine by this Friday will be terminated from their roles. For nursing homes, that represents approximately 25% of the workforce.

Due to the existing workforce shortage, providers have increasingly relied on contract or agency staffing services to supplement the care they provide. In fact, a recent survey of PHCA members revealed that 70% of respondents are utilizing agency staff to fill open positions. But even those staffing agencies are sending workers to facilities outside of the city limits to avoid the mandate, leaving providers with nowhere to turn for assistance.

This is in addition to other drastic measures providers have taken, including limiting or restricting new admissions, due to lack of trained, qualified staff.

Pennsylvania Health Care Association

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It's important to note that our long-term care workforce is already being tested for COVID-19 regularly, and masking, PPE use, and other stringent infection control protocols remain in place in every facility.

As we await forthcoming federal guidance – and a similar mandate – from the Centers for Medicare and Medicaid Services (CMS), and as we work to combat the current workforce crisis, **we are requesting the Philadelphia Department of Public Health delay its mandate deadline so that providers have more time to boost COVID-19 vaccine acceptance rates.**

Additionally, **we are requesting that you consider an alternative to mandating the vaccine, such as routine, weekly testing, so that workers can remain on the frontlines to provide care for our vulnerable residents.**

However, if you choose to move forward, please consider how the city will support its vulnerable residents if providers are forced to terminate caregivers. Without those caregivers — our healthcare heroes — facilities simply cannot provide care. The city may reach its vaccination goal, but this loss of staff could force resident discharges, facility mergers or even closures. **Does the Department of Health have a plan in place if this occurs? Is there a plan to address the loss of our essential workforce?**

Ultimately, we are asking you to partner with us, as well as our providers, to find solutions to ensure the continuity of care for our most vulnerable residents.

Thank you for your consideration. If you have any questions regarding these requests, please contact me.

Sincerely,



Zachary Shamberg
President and CEO

CC: Pennsylvania Acting Secretary of Health Alison Beam
Philadelphia Legislative Delegation