



December 2, 2020

Governor Andrew Cuomo  
Chair  
National Governors Association  
444 North Capitol Street, Suite 267  
Washington, DC 20001

Governor Asa Hutchinson  
Vice Chair  
National Governors Association  
444 North Capitol Street, Suite 267  
Washington, DC 20001

**Re: Phase 1A COVID-19 Vaccine Distribution for People with Intellectual and Developmental Disabilities (I/DD) and their Direct Support Professionals (DSPs)**

Dear Governors Cuomo and Hutchinson:

Thank you for all of your leadership during the COVID-19 public health emergency. We write to you today in support of the CDC's Advisory Committee on Immunization Practices (ACIP) December 1 decision to prioritize health care workers and individuals living in long-term care (LTC) facilities for Phase 1A vaccine access. We urge all governors to explicitly classify DSPs as health care workers and people with I/DD living in Intermediate Care Facilities (ICFs), group homes, and other congregate settings as living in an LTC facility.

The American Network of Community Options & Resources (ANCOR) is a national, nonprofit trade association representing more than 1,600 private community providers of services to people with disabilities. Combined, we support over one million individuals with disabilities, and work to shape policy, share solutions and strengthen the community. The DSPs who deliver these supports are frontline health care staff who are key to keeping individuals with I/DD healthy in the community instead of in already overwhelmed hospitals, emergency rooms and nursing homes. Since the pandemic has started, we have focused on ensuring the well-being and survival of individuals with I/DD and the staff supporting them.

ANCOR firmly believes that DSPs, health care workers on the frontlines keeping people with I/DD safe during the pandemic, must be prioritized in states' vaccine distribution plans. DSPs are critical to supporting people with I/DD to do everything from activities of daily living to taking precautions to avoid exposure to the coronavirus. Because they often work in people's homes, ICFs, group homes, and in situations where social distancing is not possible, prioritizing DSPs to receive the vaccine will be a critical step in keeping the people they support safe and healthy.

For months, ANCOR has also advocated that people with I/DD be explicitly included in the top priority tier to receive the vaccine because mounting research shows particularly significant risks facing this group. [Data recently collected from eight states](#) in partnership with ANCOR's state association members found that people with I/DD were twice as likely as members of the general population to die from COVID-19, despite being no likelier to contract the virus. Meanwhile, an [analysis of insurance claims data conducted by Fair Health](#) found people with "developmental disorders" were among the likeliest to die from COVID-19, while [another study in the UK](#) found people with Down syndrome were 10 times likelier to die from COVID-19 compared to members of the general population.

Given the expedited timeline on which forthcoming COVID-19 vaccines will be approved by the FDA and allocated according to states' distribution frameworks, it is absolutely imperative for states that have yet to identify people with I/DD who are living in ICFs, group homes, and other congregate settings as a top-tier priority. Individuals who live in ICFs, group homes or other congregate residential settings are at equivalent risk to older adults who live in congregate settings. In partnership with the American Academy of Developmental Medicine & Dentistry (AADMD), the National Association of State Directors of Developmental Disabilities Services (NASDDDS), the National Alliance for Direct Support Professionals (NADSP), and the Developmental Disabilities Nurses Association (DDNA), ANCOR submitted [comprehensive comments on vaccine allocation and safety](#) to the National Academies of Sciences, Engineering, and Medicine.

State governments should be applauded for the important work they've done in response to the record speed at which vaccine developers have created a highly effective antidote to this deadly virus. ANCOR stands as a ready and eager partner to these lawmakers as we all work to ensure the fastest possible recovery from a global pandemic that has wreaked havoc on the lives of far too many Americans.

We appreciate the urgency of the task facing all governors, particularly as the number of COVID-19 cases surges across the country. We welcome the opportunity to be a resource to you and all state governments in this work as we are united by a common goal: ensuring that the needs of people with I/DD and their DSPs are addressed.

Please contact Shannon McCracken, ANCOR's Vice President of Government Relations, at [smccracken@ancor.org](mailto:smccracken@ancor.org) with questions or to discuss further.

Sincerely,

A handwritten signature in black ink that reads "Barbara Merrill". The signature is written in a cursive style with a large initial "B".

Barbara Merrill, Esq.  
Chief Executive Officer  
ANCOR