**MSCA Written Comments to Proposed Changes to Regulations related to COVID-19 Vaccination of Staff, specifically 105 CMR 150.000 Standards for Long-Term Care Facilities**

On behalf of the Massachusetts Senior Care Association (MSCA), representing nearly 350 long term care facilities employing and caring for over 100,000 individuals, we appreciate the opportunity to submit written testimony in support of the Department of Public Health’s proposed amendments to 105 CMR 150.000 Standards for Long-Term Care Facilities. These amendments would align the COVID-19 staff vaccination requirements with the current regulations requiring influenza vaccination of all staff unless the staff member declines the vaccine for any reason (medical contraindications, religious beliefs, personal reasons or other.)

Throughout the pandemic, to protect residents and staff, long-term care providers have promoted the COVID-19 vaccine to both their residents and staff. In alignment with the Department of Public Health requirement that was implemented during the pandemic, 97.7% of all staff in long-term care facilities received an initial series and a booster dose of the COVID-19 vaccine and facilities implemented rigorous infection control practices as part of their commitment to protecting our most vulnerable population.

Today, one in five caregiving positions are vacant in nursing facilities, and there is a dire need to immediately hire 6,100 licensed nurses and certified nurse aides (CNAs). This staffing shortage is threatening the stability of the healthcare system with over one-third of the Commonwealth’s nursing facilities denying or limiting admissions due to an inadequate number of staff. Nursing facilities have had to compete with other health care settings where staff were not required by regulation to be up-to-date on vaccinations. The proposed amendments to the regulations for both long-term care facilities and other health care settings will go a long way toward “leveling the playing field” in regard to enabling facilities to recruit new staff to the long-term care sector.

The conditions and circumstances of the COVID-19 public health emergency have evolved over the last three years, including the high COVID-19 vaccination rates in long-term facility staff and residents, the implementation of strict infection control protocols, a decrease in the severity of illness and the availability of therapeutics to treat COVID-19. Considering these significant positive changes, Mass Senior Care supports the proposed revision to the regulations and the approach to staff vaccination requirements which will align with those for other infectious diseases, specifically influenza.

Thank you for the opportunity to submit written testimony on the proposed regulatory amendments to 105 CMR 150.000 Standards for Long-Term Care Facilities. Should you have any questions, please contact Tara Gregorio, President, Massachusetts Senior Care Association at tgregorio@maseniorcare.org or 617-558-0202.