

From: [Pagenkopf, Sarah](#)
To: [DHS SDMAC](#)
Subject: Question?
Date: Friday, December 11, 2020 2:42:01 PM

Greetings,

Spoke vaccinators, like my site, will need to vaccinate their populations within 5 days if they receive an allocation of the Pfizer vaccine.

At locations without the ultra-cold freezer (the spoke), the vaccine distribution to me and the populations in my community/or HCP team may be slower delayed (but also because we are asked to stagger dosing to avoid vaccine side effect stopping an individual from providing patient care).

Would the SDMAC agree that the determination of when more vaccine should be deployed should be based upon the number of vaccine doses reported in the WIR? Would the SDMAC recommend against further distributions to vaccinators who have not yet used their allotment?

Sarah Pagenkopf, PharmD, BCPS
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From: [Jim Stoa](#)
To: [DHS SDMAC](#)
Cc: [Rick Abrams](#); [Pat Boyer](#)
Subject: Public Comment - Vaccine Subcommittee Draft Document: Recommendations for the State of Wisconsin on Distributing COVID-19 Vaccine Allotments in Phase 1a
Date: Friday, December 11, 2020 1:17:06 PM
Attachments: SDMAC Draft Document Public Comment - 12.11.2020.pdf

Good afternoon –

Attached, please find a letter from WHCA/WiCAL President & CEO Rick Abrams, submitted as public comment to the SDMAC Vaccine Distribution Subcommittee.

Please let me know if you have any questions.

Sincerely,

Jim Stoa
Government Relations/Regulatory Affairs Director
Wisconsin Health Care Association
Wisconsin Center for Assisted Living
(608) 257-0125 (office)
(608) 436-3952 (mobile)

WHCA / WiCAL

Wisconsin Health Care Association

Wisconsin Center for Assisted Living

DATE: December 11, 2020

TO: State Disaster Medical Advisory Committee (SDMAC)
Vaccine Distribution Subcommittee

FROM: Rick Abrams, President & CEO
Wisconsin Health Care Association
Wisconsin Center for Assisted Living

RE: Public Comment on Draft Document: *Recommendations for the State of Wisconsin on Distributing COVID-19 Vaccine Allotments in Phase 1a*

To Whom it May Concern:

Thank you for the opportunity to submit public comments on behalf of our skilled nursing facility (SNF), assisted living facility (ALF), and home care provider members across the state of Wisconsin.

The Wisconsin Health Care Association and Wisconsin Center for Assisted Living (WHCA/WiCAL) is a non-profit organization dedicated to representing, protecting and advancing the interests of Wisconsin's long-term and post-acute care provider community and the residents they serve. WHCA/WiCAL represents providers from across the long-term care spectrum, including skilled nursing facilities, assisted living centers, and home care providers.

First, WHCA/WiCAL and our members thank the SDMAC for its commitment to creating an efficient and practical vaccine distribution plan. The process and planning is complex, and we are thankful for your leadership to ensure a timely and effective distribution of vaccines.

WHCA/WiCAL supports the inclusion of Health Care Personnel (HCP) and Residents of Long-Term Care Facilities (RLTCF) in Phase 1a. We also recognize that due to a limited initial supply, there will be a need to prioritize within Phase 1a recipients. Our continued request is that LTC be prioritized for vaccination, and that the Pharmacy Partnership for LTC be implemented as soon as possible. Early vaccination of HCP who work at LTC facilities is critical so that these individuals, who are mobile within their communities and work closely with LTC residents on a regular basis, are able to fulfill their duties with more confidence that they are protected, and also will be less likely to serve as a source of spread within an LTCF. Early vaccination of RLTCF will help protect our state's most vulnerable populations who are more susceptible to serious adverse health reactions to COVID-19, including death.

In relation to the numbered recommendations included on page 2 of the draft document:

- WHCA/WiCAL appreciates the need to minimize geographical disparities at the outset, but we also share a concern that administering less than the needed number of doses will require additional visits or follow-up actions by vaccinators and vaccinees, which will likely create logistical issues.
- WHCA/WiCAL supports the subcommittee's proposal for subprioritization among RLTCF based on medical vulnerability.
- WHCA/WiCAL supports the subcommittee's proposal to incentivize vaccinating entities to vaccinate unaffiliated HCPs. This will likely help address cold storage infrastructure concerns

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among facilities and will also allow for vaccination opportunities for other health care workers, including home care workers.

- WHCA/WiCAL understands the subcommittee’s current conclusion that, as COVID rates are high across the state, the vaccination distribution plan must have equitable geographic distribution at this point. However, WHCA/WiCAL requests that the vaccine distribution plan be sufficiently adaptive to allow for reevaluation of vaccine distribution based on need, as positivity rates and community spread levels change in communities or regions of our state over the next several months.
- While we understand the subcommittee’s perspective on not weighing current staffing shortages while considering prioritization of vaccines, we must emphasize that LTC staffing shortages have been exacerbated by COVID-19, and the faster that these workers can get vaccinated as a whole, the better for staff, providers, and residents. Again, we would ask that the distribution plan be adaptive to allow for changes to address future need after vaccine distribution is underway and as COVID-19 rates shift.

WHCA/WiCAL also supports the subcommittee’s draft document, *Recommendations for State of Wisconsin to Distribute a Multiple Dose COVID-19 Vaccine*. We support reliance on CDC guidance to ensure that the limited supply of vaccines is used as efficiently and practically as possible.

Once again, thank you for the opportunity to share the perspective of Wisconsin’s long-term care providers. Please do not hesitate to reach out to WHCA/WiCAL with any questions.

Sincerely,



RICK ABRAMS
 President & CEO
 Wisconsin Health Care Association
 Wisconsin Center for Assisted Living

From: [Janet Zander](#)
To: [DHS SDMAC](#)
Subject: GWAAR/WAAN Public Comment - SDMAC Vaccine Distribution Subcommittee -Recommendations for Distribution of Multiple Dose Series
Date: Thursday, December 10, 2020 4:29:52 PM
Attachments: Public Comments_SDMAC Vaccine Distribution Subcommittee_Draft Distribution of Multiple Doses_RKellerman_GWAAR-WAAN_12-10-20.pdf

Please see attached public comment from the Greater Wisconsin Agency on Aging Resources, Inc. and the Wisconsin Aging Advocacy Network on the SDMAC – Vaccine Distribution Subcommittee’s draft Recommendations for State of Wisconsin to Distribute a Multiple Dose COVID-19 Vaccine.

Thank you.

Sincerely,

[Janet Zander](#)
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Greater Wisconsin Agency on Aging Resources, Inc.
www.gwaar.org



Date: December 10, 2020
To: State Disaster Medical Advisory Committee (SDMAC), Vaccine Distribution Subcommittee Members
From: Bob Kellerman, Executive Director, Greater Wisconsin Agency on Aging Resources, Inc.; Wisconsin Aging Advocacy Network, Chair
Re: Comments on the Vaccine Distribution Subcommittee of the SDMAC Draft Recommendations for State Distribution of a Multiple Dose COVID-19 Vaccine

Dear Ms. Lewandowski, Dr. Temte, and members of the SDMAC Vaccine Distribution Subcommittee,

The Greater Wisconsin Agency on Aging Resources, Inc. (GWAAR) is a nonprofit agency committed to supporting the successful delivery of aging programs and services in our service area consisting of 70 counties (all but Dane and Milwaukee) and 11 tribes in Wisconsin. We are one of three Area Agencies on Aging in Wisconsin. Our mission is to deliver innovative support to lead aging agencies as we work together to promote, protect, and enhance the well-being of older people in Wisconsin. GWAAR is also a member of the Wisconsin Aging Advocacy Network (WAAN) a collaborative group of individuals and associations working with and for Wisconsin's older adults to shape public policy to improve their quality of life.

Thank you for this opportunity to provide comments on the draft Recommendations for State Distribution of a Multiple Dose COVID-19 Vaccine. We understand limited production and distribution will require initial rationing of COVID-19 vaccine. Consistent with the Centers for Disease Control and Prevention (CDC) two-dose series allocation plans, we support the Vaccine Distribution Subcommittee (hereafter referred to as Subcommittee) recommendation to use initial allocations from the CDC to administer the first dose to eligible populations(s) and to use subsequent doses received from the CDC, initially withheld by the CDC for the purpose of second doses, to provide to vaccinating entities for the immunization of those who received the first dose and choose to receive the second.

In the absence of any additional requirements or recommendations from the CDC's Advisory Committee on Immunization Practices (ACIP), we support the Subcommittee's

recommendation that DHS and vaccinators, for planning purposes, anticipate the vaccine products are not interchangeable, and a complete vaccine series will be defined as two doses from the same vaccine product. We understand and support that timing of the vaccination, per the Wisconsin Department of Health Services provider agreement, will comply with all requirements and recommendations of the CDC, CDC's ACIP, and Food and Drug Administration (FDA) guidance.

Given the high rate of death experienced by residents living in long-term care facilities, we are very supportive of the ACIP recommendation for jurisdictions to consider first offering vaccinations to residents and health care personnel in skilled nursing facilities, depending upon the number of initial vaccine doses available. We request the Subcommittee take a formal position to support this ACIP recommendation.

Thank you for your consideration of our comments on this important COVID-19 vaccine distribution guidance.

Contact:

Robert J Kellerman

Executive Director

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bob.kellerman@gwaar.org

From: [Mark Grapentine](#)
To: [DHS SDMAC](#)
Subject: vaccine subcommittee - distribution of multiple dose series
Date: Thursday, December 10, 2020 12:32:20 PM
Attachments: Letter - SDMAC Vaccine Subcommittee - feedback and request - 12.10.20.pdf

Please see the attached feedback from the Wisconsin Medical Society's COVID-19 Task Force on the subcommittee's recommendation regarding distribution of a multiple-dose COVID-19 vaccine. The letter also includes a request for a possible SDMAC agenda item.

Thank you for all your work!

mg

Mark Grapentine, JD
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Wisconsin Medical Society

Your Doctor. Your Health.

December 10, 2020

VIA E-MAIL

State Disaster Medical Advisory Committee

Vaccine Subcommittee

To the SDMAC Vaccine Subcommittee:

Thank you for your work during this generational pandemic. As physicians and other health care professionals continue to dedicate their lives to helping patients survive COVID-19, we greatly appreciate SDMAC's efforts. The Wisconsin Medical Society's COVID-19 Task Force has similar goals of helping the public during this event, and we are pleased to have this opportunity to share thoughts regarding the state's upcoming distribution of FDA-approved vaccines.

Like the pandemic itself, distributing an extremely limited supply of vaccine doses throughout the state in a fair and equitable manner is a uniquely daunting challenge. The Society agrees with the subcommittee's recommendation to use initial allocations to administer a first dose to prioritized populations, with subsequent doses from the CDC used for second doses.

Many of our members are providing important health care services to their local communities as medical practices unaffiliated with a larger hospital or health system. These dedicated physicians wish to get vaccines for themselves and their staffs when appropriate and **would benefit from the state establishing a plan for distribution of vaccines to independent health care entities. We believe SDMAC is well-established to help develop and recommend such a plan, and we ask you to do so to ensure all physicians can continue to help fighting COVID-19.**

Thank you again for your work during these unprecedented times. Your efforts and the incredible resolve of physicians and other health care professionals over the past year has given Wisconsin hope as we get closer to emerging from the pandemic. We look forward to further collaboration.

Sincerely,

Clyde M. Chumbley, MD, MBA
Chief Executive Officer

David Letzer, DO
Chair, COVID-19 Task Force