



December 6, 2021

The Honorable Chiquita Brooks-LaSure
Centers for Medicare & Medicaid Services
U.S. Department of Health and Human Services
7500 Security Boulevard
Baltimore, MD 21244

Re: Medicare and Medicaid Programs; Omnibus COVID-19 Health Care Staff Vaccination

Dear Administrator Brooks-LaSure:

Thank you for the opportunity to provide comments on the Interim Final Rule (IFR) regarding Omnibus COVID-19 Health Care Staff Vaccination.

The American Lung Association is the oldest voluntary public health association in the United States, representing the millions of individuals living with lung diseases, and many of our constituents have lung conditions that put them at moderately to significantly higher risk for severe illness from COVID-19. The Lung Association is the leading organization working to save lives by improving lung health and preventing lung disease through research, education and advocacy.

Widespread vaccination is essential to protect healthcare workers, patients and the broader public from COVID-19 and ultimately to end the COVID-19 pandemic. The Lung Association strongly supports this IFR requiring that most Medicare- and Medicaid-certified providers and suppliers be vaccinated against COVID-19 and offers the following comments on the rule:

Protecting Healthcare Personnel

For nearly two years, healthcare personnel have been on the front lines of the COVID-19 pandemic, often at significant risk to their own health, with over 770,000 cases of COVID-19 and 2,890 deaths from COVID-19 reported among healthcare personnel as of November 28, 2021.¹ Vaccinations are an essential tool for protecting the health and wellbeing of this critical workforce. COVID-19 vaccines are safe and effective; the evidence is clear that they reduce the risk of hospitalizations and deaths from COVID-19, as well as the risk of contracting and spreading the virus.²

Some states and hospital systems that led the way in implementing COVID-19 vaccination policies have already seen meaningful increases in vaccination rates as a result of these actions.³ Similarly, the vaccination policy in this IFR will likely prompt more healthcare personnel to take this critical step to protect themselves, their colleagues and their patients from COVID-19.

Strengthening the Capacity of Our Healthcare System

COVID-19 continues to put an enormous burden on our healthcare system. From November 20 to 26, 2021, the United States averaged 73,962 new COVID-19 cases per day and 742 deaths

from COVID-19 per day.⁴ Additionally, during the same time period, 41,422 patients were hospitalized with COVID-19, with hospitals in some states struggling to meet demand for care.^{5,6} As we respond to the flu season in addition to the ongoing COVID-19 pandemic with a new emerging variant, our country must take additional steps to ensure that hospitals have capacity to treat patients in need of care for influenza, COVID-19 or any other illnesses. By reducing COVID-19 cases (especially severe cases), vaccine requirements can help to reduce the burden of COVID-19 on our healthcare system, as well as keep our healthcare workforce healthy and able to perform their jobs.

While there is still much we do not know about the Omicron variant, its emergence and the early indications of its high transmissibility call for greater vigilance.⁷ Further, new variants will likely continue to emerge as long as significant portions of the world's population are not vaccinated.⁸ This makes it even more important for our country to take steps that will reduce the burden of COVID-19 on our healthcare system and ensure hospitals and other healthcare facilities are ready to respond to changes in the course of this pandemic.

Increasing Patients' Confidence in Seeking Treatment

The vaccine policy included in the IFR will not only protect healthcare workers, but also the patients that they treat. Some patients, especially those who are immunocompromised, delayed treatment for lung diseases and other conditions during the pandemic due to fear of contracting COVID-19. Patients also delayed lifesaving preventive care, with screening rates for many cancers decreasing dramatically, including for lung cancer, at the beginning of the pandemic.^{9,10} Research has shown that as lung cancer screenings began to resume, the proportion of nodules suspicious for malignancy increased, a sign that delays in seeking preventive care had a true impact on patients' health.¹¹ Increasing the proportion of healthcare personnel who are vaccinated could help to restore patients' confidence in seeking the preventive, primary and specialty care needed to prevent and treat lung diseases and other chronic conditions.

Conclusion

Public policies promoting vaccine requirements are an important component in our efforts to defeat COVID-19, and the Lung Association strongly supports the vaccination policy advanced by this IFR. Thank you for the opportunity to provide comments.

Sincerely,



Harold P. Wimmer
National President and CEO

¹ Centers for Disease Control and Prevention. COVID-19 Data Tracker, Cases & Deaths among Healthcare Personnel. Accessed Nov. 29, 2021. Available at: <https://covid.cdc.gov/covid-data-tracker/#health-care-personnel>.

² Centers for Disease Control and Prevention. Benefits of Getting a COVID-19 Vaccine. Nov. 29, 2021. Available at: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/vaccine-benefits.html>.

³ Forbes. Covid-19 Vaccine Mandates Are Working—Here's The Proof. Oct. 4, 2021. Available at: <https://www.forbes.com/sites/tommybeer/2021/10/04/covid-19-vaccine-mandates-are-working-heres-the-proof/?sh=45f6a2392305>.

⁴ Centers for Disease Control and Prevention. COVID Data Tracker. Accessed Nov. 29, 2021. Available at: <https://covid.cdc.gov/covid-data-tracker/#datatracker-home>.

⁵ New York Times. Covid-19 Surge Strains Michigan's Hospitals. Nov. 21, 2021. Available at: <https://www.nytimes.com/2021/11/21/world/michigan-covid-surge.html>.

⁶ New York Times. Colorado Hospitals are Nearly Full as the State Battles a Growing Caseload. Nov. 3, 2021. Available at: <https://www.nytimes.com/2021/11/03/us/colorado-hospitals.html>.

⁷ Politico. All adults should get a Covid booster shot, CDC says. Nov. 29, 2021. Available at: <https://www.politico.com/news/2021/11/29/omicron-coronavirus-booster-cdc-523481>

⁸ New York Times. The W.H.O Says Omicron Poses a "Very High" Risk, as Questions Remain. Nov. 29, 2021. Available at: <https://www.nytimes.com/live/2021/11/29/world/omicron-variant-covid#the-who-says-omicron-poses-a-very-high-risk-globally>.

⁹ Centers for Disease Control and Prevention. Sharp Declines in Breast and Cervical Cancer Screening. June 30, 2021. Available at: <https://www.cdc.gov/media/releases/2021/p0630-cancer-screenings.html>.

¹⁰ Debra Patt, Lucio Gordan, Michael Diaz, Ted Okon, Lance Grady, Merrill Harmison, Nathan Markward, Milena Sullivan, Jing Peng, and Anan Zhou. *JCO Clinical Cancer Informatics* no. 4 (2020) 1059-1071. Published online November 30, 2020. DOI: 10.1200/CCI.20.00134. Available at: <https://ascopubs.org/doi/10.1200/CCI.20.00134>.

¹¹ Van Haren RM, Delman AM, Turner KM, Waits B, Hemingway M, Shah SA, Starnes SL. Impact of the COVID-19 Pandemic on Lung Cancer Screening Program and Subsequent Lung Cancer. *J Am Coll Surg.* 2021 Apr;232(4):600-605. doi: 10.1016/j.jamcollsurg.2020.12.002. Available at: <https://pubmed.ncbi.nlm.nih.gov/33346080/>.