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December 15, 2020

Dr. Nadine Burke Harris, Chair, Community Vaccine Advisory Committee  
Dr. Oliver Brooks, Co-Chair, COVID-19 Vaccine Drafting Guidelines Workgroup  
Dr. Robert Schechter, Co-Chair, COVID-19 Vaccine Drafting Guidelines Workgroup

**RE: Tier 1B Vaccine Prioritization for Californians With Developmental Disabilities**

Honorable Drs. Burke Harris, Brooks, and Schechter:

The Association of Regional Center Agencies (ARCA) represents the network of 21 community-based non-profit regional centers that coordinate services for, and advocate on behalf of, well over 350,000 Californians with developmental disabilities. We are writing in follow-up to our letter of November 29<sup>th</sup>, Re: COVID-19 Vaccine Prioritization And Californians With Developmental Disabilities.

In brief, the Tier 1B category should include people with developmental disabilities. Per our prior letter, there are well-established, heightened risk factors facing people with developmental disabilities due to COVID-19. Not only are the morbidity<sup>1</sup> and mortality<sup>2</sup> rates higher<sup>3</sup> for this population, but their exposure risks (particularly in congregate settings<sup>4,5</sup>) are also greater than for the general population.

Given the size of our community, an important distinction can be made for this proposed eligibility. Specifically, inclusion in Tier 1B can be limited to individuals eligible for either a Home and Community-Based Services (HCBS) waiver or HCBS State Plan Amendment programs. This sub-population meets all the epidemiological risk factors previously noted.

We thank you for considering the health and safety of people with developmental disabilities, the committed professionals who serve them, and the families that are integral parts of their lives. If you have any questions regarding our position, please do not hesitate to contact Daniel Savino in our office at [dsavino@arcanet.org](mailto:dsavino@arcanet.org) or (916) 446-7961.

Sincerely,

/s/Amy Westling  
Executive Director

Cc: Nancy Bargmann, Director, Department of Developmental Services  
Dr. Mark Ghaly, Secretary, Health and Human Services Agency

<sup>1</sup> <https://www.sciencedirect.com/science/article/abs/pii/S1936657420300674?via%3Dihub>

<sup>2</sup> <https://s3.amazonaws.com/media2.fairhealth.org/whitepaper/asset/Risk%20Factors%20for%20COVID-19%20Mortality%20among%20Privately%20Insured%20Patients%20-%20A%20Claims%20Data%20Analysis%20-%20A%20FAIR%20Health%20White%20Paper.pdf>

<sup>3</sup> <https://www.upstate.edu/hloa/2020/060520-turk-landes-interview.php>

<sup>4</sup> [https://www.dds.ca.gov/wp-content/uploads/2020/11/DDS\\_COVID-19\\_demographics-and-residence\\_10302020.pdf](https://www.dds.ca.gov/wp-content/uploads/2020/11/DDS_COVID-19_demographics-and-residence_10302020.pdf)

<sup>5</sup> <https://www.latimes.com/projects/california-coronavirus-cases-tracking-outbreak/nursing-homes/>