

September 21, 2020

Secretary Robert E. Neall  
Maryland Department of Health  
201 West Preston Street  
Baltimore, MD 21201

Dear Secretary Neall,

As Maryland considers a policy to allow indoor visitation at nursing homes and assisted living facilities during the COVID-19 pandemic, I write on behalf of the over 110,000 residents with Alzheimer's and their loved ones, to express concern about a potential "essential caregiver" category of visitors.

Essential caregivers may be defined as a family member (or outside caregiver, friend, or volunteer) who has provided regular care and support to the resident before or during the pandemic, who would be designated and allowed to come into the facility to advocate for individual patients and alleviate caregiving tasks for staff.

The Alzheimer's Association wants individuals at nursing homes and assisted living facilities to be able to see their loved ones; yet **visitation policy must be centered around more frequent, rapid turnaround testing to effectively manage the spread of COVID-19 for the many individuals coming in and out of facilities daily.**

The Essential Caregiver designation has had mixed results in jurisdictions where it has been adopted; for example, Minnesota introduced it in July 2020 without adequate regulations to protect the health and safety of individuals at nursing homes and assisted living facilities, and [there was a spike in COVID-19 cases](#) at these facilities three weeks later. **As Maryland is still struggling with infection control procedures—as evidenced by recent CMS inspections, and the resulting fines—how can we be certain that protocols will be enforced among caregivers entering these facilities?**

Should Maryland move forward with an essential caregiver designation, as part of an indoor visitation policy, the Alzheimer's Association urges the following considerations:

- Essential caregivers must be required to **provide results of a negative COVID-19 test conducted within the last 48 hours**, along with being subjected to temperature screening, upon each entrance into a nursing home or assisted living facility;
- In addition, **the Essential Caregiver should sign an attestation that they have isolated** in the time between the testing sample was taken and the visit, and they are free from symptoms;
- Clear guidelines must be established to guide what essential caregivers should be doing. **Essential caregivers should be a complement—and not a substitute—for trained, employed staff at nursing homes or assisted living facilities.** Family caregivers should not be assisting with activities of daily living inside care facilities (staff are primarily responsible for this role); and
- We favor policies promulgated by Arizona, [which can be viewed here](#), that set **clear and specific guidelines for indoor visitors** (see page 7). The Association does not support guidelines put forward by Florida or Minnesota, which do not fully address safety protocols.

If you have any questions, please do not hesitate to contact me at [ercolchamiro@alz.org](mailto:ercolchamiro@alz.org).

Sincerely,



Eric Colchamiro  
Director of Government Affairs  
Alzheimer's Association, Maryland

Cc: Patricia Nay, Director, Maryland Department of Health, Office of Healthcare Quality  
Diane Croghan, Deputy Chief of Staff, Governor Lawrence Hogan