December 31, 2020

The Honorable Brian P. Kemp Governor of Georgia  
206 Washington Street Suite 203, State Capitol

Atlanta, GA 30334

Commissioner Kathleen Toomey, MD, MPH

Georgia Emergency Management and Homeland Security Agency

935 United Avenue SE  
Atlanta, Georgia 30316-0055

RE: Joint Letter to Protect Vulnerable Georgians with Intellectual Disabilities and Developmental Disabilities Through the Georgia COVID-19 Vaccine Rollout Plan

Dear Governor Kemp and Commissioner Toomey:

We know this is a difficult time for all of you as you make critical decisions about the health and wellbeing of Georgians in responding to the COVID-19 pandemic, and we appreciate your efforts in developing the current Georgia COVID-19 Vaccine Rollout Plan. After reviewing the most recent research about the impact of COVID-19 on adults with intellectual disabilities and developmental disabilities (ID/DD) and the implications for the current plan, we are reaching out to you with grave concerns about one of the most vulnerable populations in Georgia and hope you can help us address these concerns.

Research shows that people with intellectual disabilities and developmental disabilities (ID/DD) are significantly more likely to be hospitalized and die from COVID-19 than the general population; therefore, the American Academy of Developmental Medicine and Dentistry, alongside national disability and Down syndrome organizations, have issued a joint statement advocating for vaccine allocation and distribution frameworks to specifically include people with ID/DD and their caregivers as a high priority given their disproportionately high level of risk.[[1]](#footnote-1)

These organizations point to research showing that “Complications from and death rates due to COVID-19 for people developmental disabilities are disproportionately higher when compared to people without developmental disabilities. Mortality rates have been cited to be up to 15% in individuals with developmental disabilities. In individuals with Down syndrome specifically, there is an estimated four-fold increase in risk for COVID related hospitalization and ten-fold increase in COVID-19 related death. Therefore, individuals with developmental disabilities must be specifically considered and prioritized in the COVID-19 vaccine allocation efforts.” (AADMD, 2020). Based on this research about the vulnerability of adults with ID/DD, states like Ohio and Oregon have already modified their vaccine allocation distribution plans to prioritize adults with ID/DD.

However, in the current Georgia COVID-19 Vaccine Rollout Plan, adults under 65 with ID/DD would not be eligible for vaccines until Phase 1C. This means that critical workforce employees (e.g., teachers, food processors, and grocery store workers) included in Phase 1B—who are vital but who likely have a much higher survival rate—would have access to vaccines before adults with Down syndrome who are ten times more likely to die from COVID-19 and who were highlighted as a high risk group that should be prioritized in updated guidelines from the CDC released this week.[[2]](#footnote-2) Because we know that Georgia values people with developmental disabilities and seeks to protect citizens who are the most vulnerable, we are hoping that adults with developmental disabilities can be specifically added to higher priority phases through amendments and clarifications to the current Georgia COVID-19 Vaccine Rollout Plan.

To better protect people at such high risk, based on the recommendations of the “Joint Position Statement on Equity for People with Intellectual and Developmental Disabilities Regarding COVID-19 Vaccine Allocation and Safety,” we suggest the following amendments and clarifications for the Georgia COVID-19 Vaccine Rollout Plan:

1. Because long-term care facility (LTCF) staff and residents are included in Phase 1A, we recommend clarifying that the definition of LTCF includes group homes, personal care homes, psychiatric facilities, or other community residential settings where people with developmental disabilities and staff are at higher risk in congregate settings. In addition, we recommend specifically clarifying that the staff can include direct support professionals (DSP) and group home staff in Phase 1A as persons serving in a health care setting and as LCTF staff.
2. Given their disproportionately high mortality rate, we would also recommend specifically adding people with ID/DD who are age 16 and older in Phase 1B and their caregivers as Ohio has done.[[3]](#footnote-3)

3. Because adults with developmental disabilities have disproportionately low income, lack transportation, and often need help understanding health issues, we recommend “reasonable modifications to ‘drive-up only’ sites or other testing facilities, such as establishing mobile vaccination programs or providing no-cost transportation, to ensure that vaccinations are accessible to people with developmental disabilities whose family members do not drive or who reside in settings that do not provide transportation. Additionally, the vaccine protocol and accompanying information must be accessible to people with developmental disabilities in plain language, in screen-reader accessible formats, and in alternative formats needed by people with developmental disabilities, including graphic format that is understandable by people who may not be able to read, and in non-English languages spoken in the US [particularly given the high immigrant population in Atlanta].” (AADMD, 2020).

We hope you will incorporate these proposed amendments as leaders who can make a tremendous impact in protecting Georgia’s most vulnerable citizens. If you have further questions, please contact Stephanie Meredith from the Center for Dignity in Healthcare for People with Disabilities at 770-310-3885 or smeredith4@student.gsu.edu.

Best Regards,

The Arc Georgia

The Adult Disability Medical Healthcare (ADMH)

Center for Dignity in Healthcare for People with Disabilities

The Center for Leadership in Disability at Georgia State University

Down Syndrome Association of Atlanta

Down Syndrome Association of South Georgia

Georgia Advocacy Office

Georgia Council on Developmental Disabilities

National Down Syndrome Congress

Cc: Lt. Governor Geoff Duncan

Senate President Pro Tempore Butch Miller

Senate Majority Leader Mike Dugan

Senate Democratic Leader Gloria Butler

Speaker of the House David Ralston

House Majority Leader Jon Burns

House Minority Leader James Beverly

1. https://static1.squarespace.com/static/5cf7d27396d7760001307a44/t/5fd9690f9e3b1725e3d0d3e2/1608083731221/Covid19Vaccine-IDD-Statement.pdf [↑](#footnote-ref-1)
2. https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html?fbclid=IwAR2WUC5HqBTzJjxWuUOE5NeYhWgscSQ\_yG5qMk3ULuk85GvVWUhgp1OVM4Y [↑](#footnote-ref-2)
3. <https://wpta21.com/2020/12/24/ohio-looks-ahead-to-phase-1b-of-vaccine-rollout/> [↑](#footnote-ref-3)