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November 15, 2021

Discussion of Facility Staff Vaccination

The October 27, 2021 Email Blast emphasized the need for Lender Narratives to address Pandemic-related staffing issues. This anticipated analysis is an application of existing requirements; it is part of the underwriting due diligence encompassed within the Lender Narrative Key Questions, as well as the “Circumstances that May Require Additional Information” section. When ORCF published the Email Blast, the Centers for Medicare and Medicaid Services (CMS) had not yet issued its Interim Final Rule regarding staff vaccines ([here](https://www.govinfo.gov/content/pkg/FR-2021-11-05/pdf/2021-23831.pdf)). That Rule was published on 11/5/21 and contains near-term compliance dates. Accordingly, ORCF expects that in addressing staffing issues, the lender narrative will speak to the facility’s plan to comply with the Interim Final Rule, to any anticipated adverse staffing impact, and to mitigants addressing the adverse impact. Additionally, the Lender’s later responses to the Lender Narrative Appendix questions regarding CMS protocols and vaccination status/plans address compliance with the Interim Final Rule.

***Keywords:*** *Staffing, Appraisals, Lender Narrative*

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