DATE: March 11, 2021

TO: HOME AND COMMUNITY-BASED ALTERNATIVES (HCBA) WAIVER AGENCIES

SUBJECT: COVID-19 VACCINE ADMINISTRATION

POLICY EFFECTIVE ON MARCH 15, 2021

PURPOSE

The purpose of this Policy Letter is to notify Home and Community-Based Alternatives (HCBA) Waiver Agencies contracted with the Department of Health Care Services (DHCS) about the update to California’s vaccine administration prioritization policy, effective March 15, 2021, and provide policy direction for the HCBA Waiver Agency participant notification plan, in advance of the March 15, 2021 effective date. Revised text is found in italics.

BACKGROUND

The California Department of Public Health (CDPH) determined initial allocations of COVID-19 vaccines in accordance to a prioritization framework based on guidance from the federal government and recommendations from the federal Advisory Committee on Immunization Practices and the National Academy of Medicine to guide prioritization for California. ¹ Under CDPH’s guidance on vaccine priorities and allocations, ² populations identified in Phase 1A and Phase 1B, Tier 1, were prioritized to receive the vaccine first.

¹ For further information on the state’s vaccination planning efforts please visit: https://covid19.ca.gov/vaccines/
² The CDPH COVID-19 Vaccine Allocation Guidelines can be accessed at the following link: https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/VaccineAllocationGuidelines.aspx
Beginning on March 15, 2021, the vaccine will become available to the next group of prioritized populations, individuals ages 16-64 who are deemed to be at the very highest risk for morbidity and mortality from COVID-19 as a direct result of one or more severe health conditions, or if as a result of a developmental or other severe high-risk disability one or more of the following applies:

- A COVID-19 infection is likely to result in severe life-threatening illness or death; OR
- Acquiring COVID-19 will limit the individual’s ability to receive ongoing care or services vital to their well-being and survival; OR
- Providing adequate and timely COVID care will be particularly challenging as a result of the individual’s disability.

These three criteria include people with a range of significant physical or behavioral disabilities. Examples include: (a) people with serious mental illness (SMI) or serious substance use disorder (SUD), (b) enrolled consumers of Regional Centers, Independent Living Centers, In Home Supportive Services, Community Based Adult Services/Adult Day Health Centers, Medi-Cal HIV/AIDS Waiver, Medi-Cal Home and Community-Based Alternatives Waiver, Medi-Cal Assisted Living Waiver, Program of All-Inclusive Care for the Elderly, California Children’s Services Program (if the child is 16-21 years old), and California Genetically Handicapped Persons Program.

See CDPH’s Provider Bulletin from February 12 for details on the eligibility policy.

Because HCBA Waiver participants receiving skilled nursing services at home or in a community setting are, by definition, at the highest risk for developing severe life-threatening illness or death from COVID-19 infection, DHCS has prepared letters to notify the HCBA Waiver population, between the ages of 16 and 64, that they are eligible to receive the vaccine as of March 15, 2021, and as vaccine supply is available in their area. The letters also include language to certify that the addressee meets the eligibility criteria for vaccination, and that can be brought to a vaccination site for verification.

To protect confidentiality, verification documentation of the diagnosis or type of disability is not required, but instead anyone meeting the eligibility requirements will be asked to sign a self-attestation that they meet the criteria for high-risk medical conditions or disabilities.
POLICY

Beginning March 15, as a direct result of their enrollment in the HCBA Waiver, HCBA Waiver participants between the ages of 16 and 64 are deemed to be at the very highest risk for severe COVID-related illness or death from COVID-19.

By or before March 12, 2021, using the enclosed letter template, HCBA Waiver Agencies are required to identify waiver participants aged 16-64 and notify them of their eligibility to receive the COVID-19 vaccine. HCBA Waiver Agencies are also required to provide a translated copy of the notification letter in the waiver participants preferred language, using translated copies of the letter provided by DHCS. The notification letter should be sent hard copy via mail, unless the HCBA Waiver Agency has established with the waiver participant their preference and ability to receive notifications via email.

Upon request, HCBA Waiver Agencies must provide assistance to HCBA Waiver participants by coordinating with participants’ Medi-Cal managed care plan or fee-for-service provider to secure vaccination appointments and assist participants who require state plan non-emergency medical transportation to travel to a vaccination site. HCBA Waiver Agencies must also help participants secure attendants as necessary to provide assistance to the participant to and from the vaccination site.

RESOURCES

There are five primary ways Waiver participants may be able to schedule a vaccination appointment after March 15, although vaccine supply remains limited nationwide.

1. Health Care Provider: CDPH recommends that individuals with these conditions seek vaccination from a primary health care provider or system, or in an alternate clinical setting. Check first with primary health care providers to see if they have vaccines and available appointments. Health care providers who have vaccines may also begin reaching out to Waiver participants, as a patients with significant, high-risk medical conditions or disabilities.

2. Pharmacies: Check with local pharmacies to see if they have vaccines and available appointments. For the month of March, federal direction is that all school and child care staff are prioritized for pharmacy vaccines, so supply for other populations remains limited.

3. Local Health Department: The local health department’s website will continue to provide information about how to find available vaccine appointments, even as national supply remains limited.
4. **Community Pop-Up Clinics:** Community pop-up clinics for people with high-risk medical conditions and disabilities will roll out in mid-March and will be targeted for equity to those living in communities with the lowest Healthy Place Index scores. Community partners will outreach to people eligible for the pop-up clinics.

5. **MyTurn:** Throughout the Spring, as vaccine supply increases and the statewide vaccinator network grows, participants will be able to schedule an appointment through California’s MyTurn, in two ways:

   - **On-line** at [www.myturn.ca.gov](http://www.myturn.ca.gov). The MyTurn website is accessible to people with disabilities and in eight languages: English, Spanish, Tagalog, Vietnamese, Mandarin, Cantonese, Korean, and Japanese.

   - **Calling the COVID-19 Hotline** at 1-833-422-4255 or 1-833-4CA-4ALL (M-F 8AM-8PM, Sa-Su 8AM-5PM). The Hotline is accessible to people with disabilities and offers services in English and Spanish, with connections to interpretive services in more than 250 languages.

   Participants will be asked to state that they have a high-risk medical condition or disability, to book an available appointment or to register for notice of future appointments when available. Participants will be able to request an accommodation at the vaccine site through MyTurn.

All vaccine clinics in California are required to ensure sites and services are accessible in accordance with the ADA (Americans with Disabilities Act) requirements.

Participants who are unable to travel to a vaccine site should check with their health care provider, local health department, or local pharmacy to ask about options available to receive the vaccine at home.

To arrange transportation to vaccine appointments for participants enrolled in a Medi-Cal managed care plan, contact the plan’s member service department to request assistance for transportation to received covered benefits. If the participant receives Medi-Cal through Fee-for-Service (FFS), Non-Medical Transportation (NMT) providers can be contacted directly to arrange transportation to vaccine appointments. A list of available NMT providers by county is available, here. If there are no NMT providers in an area, DHCS is available to assist by submitting an email to [DHCSNMT@dhcs.ca.gov](mailto:DHCSNMT@dhcs.ca.gov). Please do NOT include personal information in the email. DHCS staff will reply with a secure email asking for information about the appointment. If there is a need for Non-Emergency Medical Transportation, the participant’s medical provider can prescribe this service and put them in touch with a transportation provider to coordinate transportation to and from the appointment(s).
QUESTIONS

For further information about this PL, please contact your assigned Contract Manager or submit a question to the HCBA email inbox at: HCBAAlternatives@dhcs.ca.gov.

Sincerely,

ORIGINAL SIGNED BY

Richard Nelson, Division Chief
Integrated Systems of Care Divis