



State of California—Health and Human Services Agency
Department of Health Care Services



GAVIN NEWSOM
GOVERNOR

March 12, 2021

Policy Letter 21-01 (Revised)

To: Program of All Inclusive Care for the Elderly (PACE) Organizations

Subject: COVID-19 Vaccine Administration

Purpose

The purpose of this Policy Letter (PL) is to provide Program of All Inclusive Care for the Elderly (PACE) Organizations with information and guidance regarding COVID-19 vaccine coverage and administration in the Medi-Cal program.

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. 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:

- The individual is likely to develop severe life-threatening illness or death from COVID-19 infection.
- Acquiring COVID-19 will limit the individual's ability to receive ongoing care or services vital to their well-being and survival.

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>

- Providing adequate and timely COVID care will be particularly challenging as a result of the individual's disability.

Individuals meeting the eligibility criteria above include enrolled participants of a PACE Organization (PO).

See CDPH's [Provider Bulletin](#) from February 12 for details on the eligibility policy.

For additional details on COVID-19 vaccine administration, please see DHCS' All Plan Letter (APL) 20-022³.

POLICY

Although both the COVID-19 vaccines and associated administration fees will be carved out of the Medi-Cal PACE delivery system to Medi-Cal FFS, POs are reminded that they remain contractually responsible for providing case management and care coordination for their members regardless of whether or not they are financially responsible for the payment of services.

POs are encouraged to identify opportunities to use their existing communication pathways to support dissemination of CDPH COVID-19 public health education materials and provider educational resources. POs are required to identify participants who qualify to receive the COVID-19 vaccine in accordance with CDPH guidelines, and conduct outreach to participants and their providers to encourage receipt of the COVID-19 vaccines. POs are responsible for coordinating medically necessary care. Care coordination may involve but is not limited to, assisting participants with accessing COVID-19 vaccine administration locations, including providing non-emergency medical transportation and non-medical transportation as needed, and helping participants receive the required number of doses for the COVID-19 vaccines in a timely fashion.

Therefore, effective March 15, 2021, POs must work with subcontracted providers to vaccinate participants who are ages 16-64 who qualify for the vaccine based on a high-risk medical condition or disability. If the PO or subcontracted provider is not a vaccinator, POs should facilitate access to vaccination sites for qualified participants.

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.

POs are responsible for ensuring that their subcontracted providers comply with all applicable state and federal laws and regulations, contract requirements, and other DHCS guidance, including PACE Policy Letters and Medi-Cal managed care APLs as

³ <https://www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/APL2020/APL20-022.pdf>

PACE POLICY LETTER 20-01 (*Revised*)

determined applicable. These requirements must be communicated by each PACE Organization to all subcontracted providers.

If you have any questions regarding this PACE Policy Letter, please contact your Integrated Systems of Care Division Contract Manager.

Sincerely,

ORIGINAL SIGNED BY

Richard Nelson, Division Chief
Integrated System of Care Division