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HCBA PL #21-001 (REVISED)

DATE: December 10, 2021

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

SUBJECT: COVID-19 VACCINE ADMINISTRATION

PURPOSE

The purpose of this Policy Letter is to provide Home and Community-Based Alternatives (HCBA) Waiver Agencies contracted with the Department of Health Care Services (DHCS) with new information and guidance regarding California's COVID-19 vaccine policy that went into effect on March 15, 2021.

BACKGROUND

On March 11, 2021, President Biden signed into law H.R. 1319, the American Rescue Plan Act (ARPA) of 2021.¹ Section 9811 of the ARPA established a new mandatory Medicaid benefit and amended various other sections of the Act. Under these changes to the statute, nearly all Medicaid populations must receive coverage of COVID-19 vaccines and their administration, at no cost to the beneficiaries.

DHCS is following California's COVID-19 vaccination plan, and California's COVID-19 Vaccine Action Plan, which was approved by the California Department of Public Health (CDPH).^{2,3} California is leveraging its existing immunization framework and emergency response infrastructure to coordinate efforts between state, local, and territorial authorities to administer the vaccines. Throughout this effort, DHCS will be sharing appropriate information with Waiver Agencies, Home and Community-Based Services

¹ H.R. 1319 – ARP Act of 2021 can be accessed at the following link: <https://www.congress.gov/bill/117th-congress/house-bill/1319/text>

² For further information on the state's vaccination planning efforts, please visit: <https://covid19.ca.gov/vaccines/>

³ The COVID-19 Vaccine Action Plan can be accessed at the following link: <https://www.cdph.ca.gov/Programs/CID/DCDC/CDPH%20Document%20Library/COVID-19/Vaccine-Action-Plan.pdf>.

(HCBS) providers, Medi-Cal Managed Care Plans (MCPs), stakeholders, and Medi-Cal beneficiaries.

DHCS continues to closely monitor and respond to COVID-19, and is providing information on the COVID-19 Medi-Cal response webpage for providers, including recommended safety procedures and protocols from the Centers for Disease Control and Prevention (CDC) and CDPH to help prevent spread of COVID-19. When necessary, DHCS is providing updates to policy guidance on the administration of the COVID-19 vaccine. Waiver Agencies and HCBS providers are encouraged to continually check the COVID-19 Medi-Cal response webpage for information and updates.^{4,5}

POLICY

Waiver Agencies are reminded that they remain contractually responsible for providing comprehensive care management to their enrolled Waiver participants, and for providing care coordination regardless of whether they are responsible for authorizing individual services (i.e., both Waiver and non-Waiver services). Care coordination may involve, but is not limited to: assisting participants seeking the COVID-19 vaccine by coordinating with participants' Medi-Cal managed care plan or fee-for-service provider to schedule vaccination appointments, assisting participants who require state plan non-emergency medical transportation to travel to a vaccination site, securing attendants (as necessary), helping participants receive the required number of doses of the COVID-19 vaccine in a timely fashion, and following up with participants to assist them in obtaining booster shots in alignment with the CDC's recommended timelines.

Waiver Agencies must also utilize the vaccination data provided by DHCS to help identify participants who qualify to receive the COVID-19 vaccine in accordance with CDPH guidelines, and attempt to educate non-vaccinated participants and encourage them to receive the COVID-19 vaccines.

COVID-19 Vaccine Administration

CDPH provides guidance on vaccine priorities and allocations.⁶ Currently, vaccines may be given to every Californian **age five (5) and older**, in accordance with CDC and ACIP guidelines.⁷ The "My Turn" website can be used to identify Californians who qualify to receive the COVID vaccine and schedule appointments. Users enter their information on the website and can sign up to be notified over text or email when they are eligible to

⁴ The COVID-19 Medi-Cal Response webpage can be accessed at the following link: https://files.medi-cal.ca.gov/pubsdoco/COVID19_response.aspx

⁵ For more information, *please* see the DHCS COVID-19 Vaccine Administration FAQs for Providers, which is available on the COVID-19 Medi-Cal Response webpage.

⁶ 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>

⁷ The CDC and ACIP guidelines can be accessed at the following link: <https://www.cdc.gov/vaccines/hcp/acip-recs/vacc-specific/covid-19.html>.

receive the vaccination.⁸ HCBA Waiver participants can call their Waiver Agencies for assistance, as needed.

The MyTurn website also has a check box that asks if an individual needs transportation to a vaccine appointment, or is homebound (due to limited mobility or fragile health) and needs to receive a vaccine in their home. If the individual checks this box, they will be notified that they will receive a call to schedule their vaccine appointment. A customer service representative from the California COVID-19 Vaccination Services Information Line call center will contact the individual. If the individual needs transportation and is enrolled in an MCP, the call center representative will schedule their vaccine appointment and connect them to their MCP for transportation coordination. If the individual is homebound and checks the appropriate box, the call center representative will provide the individual's information to the Local Health Department (LHD), and the LHD will then arrange for a medical team to visit the individual at home to vaccinate the individual and any family members.

Waiver Agencies should take steps to identify participants who may be homebound and contact those participants to determine if they have already been vaccinated against COVID-19, and if not, whether the participant requires assistance with the MyTurn appointment request system to check the box to indicate they need an in-home vaccination. Assistance for participants is also available through the California COVID-19 Hotline at 1-833-422-4255.

Waiver Agencies should work to identify, prioritize, and reach out to qualified participants the **age of five (5) years** and above to inform them about their vaccination eligibility.

Third Dose of Vaccine for Persons Considered Moderately or Severely Immunosuppressed

The Food and Drug Administration (FDA) has authorized, and the CDC recommends, that persons with certain medical conditions that suppress the immune system get a third dose of the mRNA COVID-19 vaccines (Pfizer or Moderna, whichever they initially received) at least 28 days after the second dose.⁹ This third dose can help protect individuals with weakened immune systems who may not have had a strong enough response to the first two (2) doses of one of the mRNA vaccines.

Booster Recommendations

A booster is an additional dose of vaccine given after the protection provided by the original shot(s) has begun to decrease over time, designed to help individuals maintain their immunity for longer. The FDA has authorized, and the CDC recommends, that

⁸ The MyTurn appointment request system can be accessed at the following link: <https://myturn.ca.gov/>

⁹ The CDC guidelines on COVID-19 vaccines for people with moderately to severely immunocompromised immune systems can be accessed at the following link: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/recommendations/immuno.html>

everyone ages 18 and older who received either the Pfizer-BioNTech or Moderna primary vaccines should receive a booster shot of any of the three (3) FDA-approved COVID-19 vaccines at least six (6) months after completing their Pfizer-BioNTech or Moderna primary vaccine series. The FDA has also authorized, and the CDC recommends, that individuals ages 18 and older who received the Janssen COVID-19 vaccine should receive a booster with any of the three (3) FDA-approved COVID-19 vaccines at least two (2) months after their original Janssen vaccine.^{10,11}

COVID-19 Testing Requirements for Health and Congregate Care Workers

On July 26, 2021, CDPH issued COVID-19 diagnostic testing requirements for employees in health care, long-term care, congregate living, and similar types of facilities who are not fully vaccinated against COVID-19.¹²

Face Covering Guidance in Response to COVID-19 Variants and Population Vaccination Rates

On July 28, 2021, CDPH issued guidance on the use of masks. The purpose of this guidance is to provide information about higher-risk settings where masks are required or recommended to prevent transmission to persons with higher-risk of infection (e.g., unvaccinated or immunocompromised persons), to persons with prolonged, cumulative exposures (e.g., workers), or to persons whose vaccination status is unknown.¹³

Requirements for Visitors in Acute Health Care and Long-Term Care Settings

On August 5, 2021, and as amended on August 26, 2021, CDPH issued a Public Health Order pertaining to indoor visitation at general acute care hospitals, skilled nursing facilities, intermediate care facilities, and adult and senior care residential facilities licensed by the California Department of Social Services. Requirements on limitation of indoor visitation at these facilities is being issued in order to prevent the further spread of COVID-19.¹⁴

Health Care Worker Vaccine Requirement

On August 5, 2021 and September 9, 2021, CDPH issued a Public Health Order related to workers who provide services or work at specified health care facilities. Under the

¹⁰ The CDC statement on booster recommendations can be accessed at the following link:

<https://www.cdc.gov/media/releases/2021/p0924-booster-recommendations-.html>

¹¹ The CDPH Pfizer COVID-19 vaccine boosters' recommendations can be accessed at the following link:

<https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Pfizer-COVID-19-Vaccine-Boosters.aspx>

¹² The CDPH State Public Health Officer Order of July 26, 2021 can be accessed at the following link:

<https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Order-of-the-State-Public-Health-Officer-Unvaccinated-Workers-In-High-Risk-Settings.aspx>

¹³ The CDPH Guidance for the Use of Face Coverings can be accessed at the following link:

<https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/guidance-for-face-coverings.aspx>

¹⁴ The CDPH State Public Health Officer Order, Amending the Order of August 5, 2021 can be accessed at the

following link: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Order-of-the-State-Public-Health-Officer-Requirements-for-Visitors-in-Acute-Health-Care-and-Long-Term-Care-Settings.aspx>

Public Health Order, all workers, as defined, must have their first dose of a one-dose regimen or their second dose of a two-dose regimen by September 30, 2021.^{15,16}

On September 28, 2021, CDPH issued a Public Health Order expanding the definition of a worker in adult and senior care facilities and in-home direct care settings. By November 30, 2021, all workers, as defined, must have their first dose of a one-dose regimen or their second dose of a two-dose regimen.¹⁷

Waiver Agencies are responsible for ensuring that their employees comply with all applicable state and federal laws and regulations, contract requirements, and other DHCS guidance, including HCBA Waiver Policy Letters. These requirements must be communicated by Waiver Agencies to their employees.

RESOURCES

There are five (5) primary ways Waiver participants may be able to schedule a vaccination appointment.

1. Health Care Provider: CDPH recommends that individuals 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 be 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.
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 were rolled out mid-March and targeted equal access to those living in communities with the lowest Healthy Place Index scores. Community partners provide outreach to people eligible for the pop-up clinics.
5. MyTurn: Participants are able to schedule a vaccination appointment through California's MyTurn, in two (2) ways:

¹⁵ The CDPH State Public Health Officer Order of August 5, 2021 can be accessed at the following link: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Order-of-the-State-Public-Health-Officer-Health-Care-Worker-Vaccine-Requirement.aspx>.

¹⁶ The CDPH All Facilities Letter 21-34 can be accessed at the following link: <https://www.cdph.ca.gov/Programs/CHCO/LCP/Pages/AFL-21-34.aspx>.

¹⁷ The CDPH State Public Health Officer Order of September 28, 2021 can be accessed at the following link: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Order-of-the-State-Public-Health-Officer-Adult-Care-Facilities-and-Direct-Care-Worker-Vaccine-Requirement.aspx>.

- **On-line** at myturn.ca.gov. The MyTurn website is accessible to people with disabilities, in eight (8) 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 if they have a high-risk medical condition or disability, to schedule an available appointment or register to receive notice of future appointments when they become available. Participants are able to request necessary accommodations at the vaccine site through the MyTurn system.

The MyTurn appointment request system was updated to include a check box for participants to identify if they need transportation to a vaccination appointment, or are homebound due to limited mobility or fragile health and therefore need to receive the vaccine in their home. If the individual checks this box, they will be notified that they will receive a call to schedule their at home vaccination appointment.

A customer service representative (representative) from the California COVID-19 Vaccination Services Information Line call center (call center) will contact the individual. If the individual needs transportation and has Medi-Cal, and is enrolled in an MCP, the call center representative will schedule their vaccine appointment and connect them to their MCP for transportation coordination.

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

If the participant is homebound, the call center representative will provide the individual's information to the LHD. The LHD will then arrange for a medical team to visit the participant at home to administer the vaccine to the individual and any family members.

HCBA Waiver Agencies should take steps to identify homebound participants who are unable to travel to receive a vaccination. For participants who want to be vaccinated but are unable to leave their home, the Waiver Agency should inform the participant that he or she is now able to request an in-home vaccination through the MyTurn appointment request system. Waiver Agencies must assist participants using the MyTurn website to register to receive an in home vaccination, as needed. Assistance for participants is also available through the California COVID-19 Hotline at 1-833-422-4255. For participants who do not want an in-home vaccination, Waiver Agencies must assist in coordination of vaccine services and transportation.

To schedule transportation to vaccine appointments for participants enrolled in a Medi-Cal managed care plan, contact the managed care 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. 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 Division