



January 12, 2021

Mr. Will Lightbourne, Director
California Department of Health Care Services
1501 Capitol Avenue, MS 4000
P.O. Box 997413
Sacramento, CA 95899

Re: COVID-19 Vaccination and Community Health Centers' Role in Reaching Herd Immunity

Dear Director Lightbourne:

On behalf of Health Center Partners of Southern California, I deeply appreciate the work of the Governor, Secretary Ghaly, and the Department of Health Care Services as all work together to protect and uphold public health while also addressing the political, economic, and social ramifications of the pandemic. Thank you very much.

Today, roughly 1,370 CHCs in California provide high-quality comprehensive care to 7.2 million people, or 1 in 6 Californians, or 1 in 5 in San Diego. CHCs serve the state's most vulnerable and marginalized populations including 1 in 3 Medi-Cal beneficiaries. The vision of achieving COVID-19 herd immunity is real, shared, and will require vaccination resources and support to become implemented successfully. Health Center Partners, like DHCS, appreciates the tremendous complexity of mass vaccination. Members welcomed the announcement by DHCS regarding a COVID-19 vaccine-related State Plan Amendment (SPA) as it demonstrated the state's proactive response. I know COVID-19 vaccine administration reimbursement at the Medicare rate is a decision not taken lightly, and I know this will be important for the Medi-Cal delivery system.

Community Health Centers – which proudly serve 1 in 3 Medi-Cal recipients – continue to be reminded of the disproportionate impact of COVID-19 on their racial and ethnic communities as well as special populations, including agricultural workers and those living unsheltered. CHCs are confident in their ability to meet the vaccine needs of the communities they serve by utilizing care teams and applying tried and tested systems of patient outreach and education. These communities will continue to face significant barriers to care, which is particularly problematic for those vaccines requiring two different clinical visits. CHCs continue to manage the financial toll of the pandemic and require resources to rebuild and maintain capacity through this critical initial immunization period. **For these reasons, I respectfully request the Administration authorize PPS reimbursement for each completion of two COVID-19 vaccine doses until California has achieved herd immunity.**



The Community Health Centers' Role in the COVID-19 Response to Date

Since the beginning of the pandemic, CHCs and their staffs have been on the frontline conducting COVID-19 testing and providing medically necessary services to patients. Community Health Centers' ability to quickly respond to the pandemic and expand testing capacity was enhanced substantially by the Administration's commitment to reimbursing PPS for telephonic and telehealth visits. At HCP, member Community Health Centers rose to the occasion during the COVID-19 pandemic and conducted more than 104,533 diagnostic tests to date and identified more than 12,769 cases of COVID-19 infection, many through walk-up or drive-up testing. Moreover, in doing so, member Community Health Centers conducted many of these clinical visits virtually: 48% of all health care encounters were completed using telephonic or telehealth modalities.

As member Community Health Centers' COVID-19 responses demonstrate, CHCs are providers of care to the populations most in need of the vaccine. Should the Administration authorize PPS reimbursement, I believe the pace of equitable herd immunity will be achieved far faster thereby reducing illness and saving lives.

With proper resources, Community Health Centers can quickly adapt and expand services to meet the moment. **For these reasons, I respectfully request the Administration authorize PPS reimbursement for each completion of two COVID-19 vaccine doses until California has achieved herd immunity.**

I thank you in advance for your consideration of this urgent request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Henry N. Tuttle".

Henry N. Tuttle
President and Chief Executive Officer
htuttle@hcpsocal.org

cc: Jacey K. Cooper, State Medicaid Director
Lindy Harrington, Chief Deputy

[Health Center Partners of Southern California](#), a family of companies, includes a [17-membership organization](#) of Federally Qualified Health Centers, Indian Health Services Organizations, both urban and sovereign, and Planned Parenthood of the Pacific Southwest, collectively serving 966,000 patients each year, for 3.7 million patient visits each year, at 160 practice sites across San Diego, Riverside, Imperial counties, with the seventh largest provider group in the region. Read our [2019/2020 Impact Report](#).