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ALL PLAN LETTER

DATE: March 12, 2021

TO: All Health Plans
All DMHC-Registered Risk Bearing Organizations

FROM: Sarah Ream
Chief Counsel

SUBJECT: APL 21-012 - COVID-19 Vaccine Prioritization for Individuals with High-Risk Health Conditions and/or Disabilities

On February 12, 2021, the California Department of Public Health (“CDPH”) issued a Provider Bulletin (“Provider Bulletin”) regarding vaccine prioritization for individuals deemed to be at the very highest risk to get very sick from COVID-19 either because the individual has one or more enumerated severe health conditions and/or a developmental or other significant, high-risk disability. Please follow the link to view the [CDPH’s Provider Bulletin](#).

On March 11, 2021, the CDPH issued guidance to the public regarding how people at the very highest risk, as described in the Provider Bulletin, can gain access to COVID-19 vaccinations beginning March 15, 2021. That guidance can be found at [California Department of Public Health](#).

The purpose of this APL is to ensure health care service plans (“health plans”) take all appropriate steps to help enrollees at the very highest risk receive COVID-19 vaccinations in a timely and efficient manner. Health plans should coordinate with their contracted health care providers to engage in outreach to enrollees at the very highest risk to ensure those enrollees are aware they are eligible to receive COVID-19 vaccinations and how the enrollees can obtain vaccinations.

To protect confidentiality, vaccinators *will not* require an enrollee at the very highest risk to present documentation (e.g., a letter from the enrollee’s health care provider) evidencing the enrollee’s health condition or disability. Rather enrollees who meet the eligibility requirements as outlined in the Provider Bulletin and the March 11, 2021 guidance will be asked to sign a self-attestation that they meet the criteria for high-risk medical conditions and/or disabilities.

Health plans must ensure their staff—particularly call center staff and other staff who serve as a front line for answering enrollee inquiries—understand the new vaccination eligibility requirements for people at the very highest risk. Staff must also be aware that

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enrollees *do not* need to obtain documentation from their health plan or provider of a health condition and/or disability as a prerequisite to receiving a COVID-19 vaccination. Health plan staff should be familiar with the Provider Bulletin and with the CDPH guidance issued on March 11, 2021, so staff can help enrollees understand whether they are eligible for COVID-19 vaccinations and, if eligible, how enrollees can go about obtaining vaccinations.

If you have questions about the requirements of this APL, please contact your plan's assigned reviewer in the DMHC's Office of Plan Licensing.