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September 22, 2021

The Honorable Chiquita Brooks-LaSure
Administrator
Centers for Medicare & Medicaid Services
Department of Health and Human Services
Attention: CMS-1751-P
Mail Stop C4-26-05
7500 Security Boulevard
Baltimore, MD 21244-1850
Chiquita.Brooks-LaSure@cms.hhs.gov

Dear Administrator Brooks-LaSure,

RE: Delayed Medi-Cal Reimbursement for Vaccine Administration – Federally Qualified Health Centers (FQHCs)

Beginning in December 2020, Los Angeles County Department of Public Health (LACDPH) enlisted community COVID-19 vaccination support from our Centers for Disease Control and Prevention (CDC) and California Department of Public Health (CDPH) approved, local COVID-19 vaccination network, most notably the Federally Qualified Health Centers (FQHCs). These clinics are uniquely located in areas of high need throughout the County and, as FQHCs, provide urgent and dire care to our most vulnerable populations, including People Experiencing Homelessness (PEH), migrant workers, and underserved families and children.

In Los Angeles County, our FQHC partners have been consistent and reliable partners, providing extensive COVID-19 vaccination services, including semi-mass vaccination points of distribution for their immediate communities, sector-driven outreach for essential service workers, and most recently, with the school season, they have provided ongoing-school-based testing and vaccination clinics, protecting our vulnerable unvaccinated young children and educators. They have been and continue to be our essential service providers to the communities most in need during this pandemic.

With the recent CDC guidance to provide additional doses for immunocompromised individuals, the planning for booster shots for those who have received a primary series, and the imminent extension of vaccination into the younger populations (under 12 years old), **we are depending on the ongoing support**

of this vital COVID-19 vaccination network of FQHC community providers. We will also rely on these critical FQHC partners as the integration of COVID-19 vaccination into the healthcare delivery system continues.

We recently learned from the Community Clinic Association of Los Angeles County (CCALAC) that our clinic partners have been operating without Medi-Cal reimbursement for this work since the beginning of the COVID-19 vaccination effort 9 months ago. We were shocked to learn of this fundamental difficulty and find it untenable given these providers' financial restraints and tremendous outlay of resources during this historic pandemic response. Moreover, we have deep concern that a continued lack of reimbursement for FQHCs will constrain our effort to provide access to vaccinations for the most vulnerable and hardest hit residents of Los Angeles County.

We are requesting expeditious Medi-Cal payment to FQHCs for vaccine administration. Rapid approval of a state Alternative Payment Methodology (APM) with full FQHC reimbursement at either the Prospective Payment System (PPS) or a cost-based rate for vaccination administration will bolster FQHCs' pandemic response, and help to maintain the continued, essential COVID vaccination effort.

Sincerely,



Barbara Ferrer, Ph.D., M.P.H., M.Ed.
Director

BF:sk

Cc: Michelle Baass
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