



Northeast Valley Health Corporation  
a californiahealth+ center



August 11, 2022

Michelle Baass, Director  
California Department of Health Care Services  
1501 Capitol Avenue  
Sacramento, California 95814

## Re: Medi-Cal Reimbursement for Monkeypox Vaccine Administration by FQHCs

Dear Director Baass:

We, the undersigned, are writing to express our profound shock and disappointment with the recent announcement from the California Department of Health Care Services (DHCS) that Medi-Cal will only reimburse Federally Qualified Health Centers (FQHCs) for monkeypox vaccine administration when provided during a face-to-face visit with a billable provider.<sup>1</sup> This decision will significantly hamper the ability of FQHCs to respond to the monkeypox outbreak with the speed and urgency it requires and flies in the face of Governor Newsom's declared State of Emergency. As health care providers who serve a significant percentage of low-income LGBTQ+ Californians, we believe this decision is a flagrant example of institutionalized homophobia and we urge the department to reverse course immediately. Monkeypox vaccine administration by FQHCs should be reimbursed in the same way as COVID-19 vaccines.

<sup>1</sup> Monkeypox Services and Reimbursement for FQHC, RHC, IHS-MOA and Tribal FQHC Providers. Available at: [https://files.medi-cal.ca.gov/pubsdoco/newsroom/newsroom\\_31823\\_03.aspx](https://files.medi-cal.ca.gov/pubsdoco/newsroom/newsroom_31823_03.aspx).

As you well know, monkeypox is spreading rapidly across California and new cases have more than doubled in the last two weeks alone. Like the early days of the HIV epidemic, the LGBTQ+ is disproportionately affected by the current outbreak – with gay and bisexual men accounting for the overwhelming majority of new cases. Nearly half of all confirmed cases in the state are among Blacks and Latinos.<sup>2</sup> While thankfully there have been no deaths associated with the current outbreak in California, a monkeypox diagnosis can result in debilitating pain, emotional trauma, and crippling financial consequences. Our staff have been working around the clock to provide the LGBTQ+ community with desperately needed education and resources, testing, vaccination, treatment, and wraparound support services.

Regrettably, DHCS' announcement this week will only make it harder for many of our most vulnerable LGBTQ+ Medi-Cal patients to be vaccinated. In the FQHC setting, monkeypox vaccines are generally administered outside of a primary care visit by a non-billable provider. This allows us to vaccinate a significantly greater number of patients on a daily basis. Forcing Medi-Cal patients to have a face-to-face visit with a primary care provider will dramatically slow our current vaccination effort and make it even harder to control the current outbreak. In the time it takes for one individual to have their vitals taken and engage in a face-to-face visit with a primary care provider, FQHCs have the ability to vaccinate 15-20 people. DHCS' policy makes absolutely no sense from a public health perspective and it screams of discrimination.

During the COVID-19 public health emergency, DHCS recognizing the increased costs associated with administration of COVID-19 vaccines and submitted a State Plan Amendment (SPA 21-0020) to the Centers for Medicare and Medicaid Services (CMS) for reimbursement of COVID-19 vaccine administration by FQHCs above the applicable Prospective Payment System (PPS). On March 2, 2022, CMS approved the SPA with a required reimbursement rate of \$67 per shot.<sup>3</sup> We are dumbfounded why DHCS has chosen a different approach for monkeypox vaccine administration by FQHCs and we are left wondering if it is because the current outbreak is primarily impacting gay and bisexual men and transgender individuals.

To be clear, FQHCs are critical partners in ensuring that monkeypox vaccines are administered quickly and equitably. FQHCs have longstanding, trusted relationships with low-income communities, communities of color, LGBTQ+ communities, and others who are traditionally marginalized by the health care system. As was the case during the COVID-19 pandemic, FQHCs play a critical role in ensuring equitable access to vaccines in marginalized communities that are otherwise often least likely to receive the vaccine.

We strongly urge DHCS to reconsider its decision and ensure that FQHCs have the ability to respond to the monkeypox outbreak with the urgency and attention it deserves. Monkeypox vaccine administration by FQHCs should be reimbursed in the same way as COVID-19 vaccines. If DHCS needs federal approval to reimburse FQHCs for vaccinations outside of a primary care visit by a non-billable provider, we urge DHCS to request that flexibility immediately. Until CMS approval, DHCS should issue a provider bulletin that provides claim submission guidance to FQHCs for these urgently needed vaccinations.

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<sup>2</sup> Monkeypox Data in California. Available at: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/Monkeypox-Data.aspx>.

<sup>3</sup> California State Plan Amendment 21-0020. Available at: <https://www.dhcs.ca.gov/Documents/COVID-19/SPA-CA-DR-21-0020.pdf>.

Thank you for your attention to this urgent issue. If you have any questions, please contact Craig Pulsipher at [cpulsipher@aplahealth.org](mailto:cpulsipher@aplahealth.org).

Sincerely,

APAIT  
APLA Health  
CaliforniaHealth+ Advocates  
Community Clinic Association of Los Angeles County  
DAP Health  
Imperial Court of Los Angeles and Hollywood  
Los Angeles LGBT Center  
National Harm Reduction Coalition  
Northeast Valley Health Corporation  
PRC  
Radiant Health Centers  
San Francisco AIDS Foundation  
St. John's Community Health  
TransLatin@ Coalition  
Unique Woman's Coalition  
Wesley Health Centers / JWCH Institute, Inc.  
Western Center on Law & Poverty

cc: The Honorable Members, Senate Select Committee on Monkeypox  
Senate President pro Tempore Toni Atkins  
Assembly Speaker Anthony Rendon  
Richard Figueroa, Office of the Governor  
Tam Ma, Office of the Governor  
Dr. Mark Ghaly, California Health and Human Services Agency Secretary  
Dr. Tomás Aragón, California Department of Public Health Director  
Jacey Cooper, DHCS Chief Deputy Director and State Medicaid Director