Health Advisory for SF Providers: COVID-19 Vaccine Eligibility Expansion to Persons Under 65 with Qualifying Conditions

March 11, 2021

The following information is issued on behalf of the SF COVID-19 Command Center

Situational Update and Key Messages

As of 3/8/2021, 26% of San Francisco residents age >16 years, and 68% of those age >65 years have received at least 1 dose of COVID-19 vaccine. In total, over 319,000 doses have been administered in San Francisco to those who live or work here. See the SF COVID-19 Vaccine Data Tracker for updated information. Our continued appreciation goes out to all the providers contributing to this extremely important citywide vaccination effort.

San Francisco is following a vaccine distribution and engagement approach in accordance with the state vaccine prioritization plan that prioritizes disproportionately impacted communities, settings, and populations to ensure those eligible for vaccines within these communities are able to receive it. To date, vaccination efforts have focused on persons in:

- Phase 1a (healthcare workers; residents of long-term care, assisted living, or similar settings)
- Phase 1b (age >65 years; food/agriculture, education/childcare, and emergency services).

California Expansion:

Beginning March 15, the California Department of Public Health (CDPH) has authorized expansion of COVID-19 vaccine eligibility (see Provider Bulletin) to include individuals ages 16 – 64 years who are deemed to be at the very highest risk for morbidity and mortality from COVID-19 as a direct result of one or more qualifying conditions.

Local SF Policy:

Recognizing that defining eligibility based on specific qualifying health conditions may exclude those not engaged in medical care or may create burdensome documentation requirements that would fall most heavily on under-resourced clinics and on communities most impacted by COVID-19, as of March 15, SF COVID Command is adopting eligibility criteria that expand on CDPH-listed conditions, while making recommendations for how providers should verify eligibility.
Eligibility Criteria

While vaccine supply continues to be scarce, effective March 15 please use your clinical judgement to vaccinate individuals age 16 – 64 years who are deemed to be at the highest risk for morbidity and mortality from COVID-19 as a direct result of one or more of the following qualifying conditions:

1) Health conditions:
   - Cancer, active
   - Chronic kidney disease
   - Severe chronic pulmonary disease, including COPD or those who are oxygen dependent
   - Down syndrome
   - Immune compromise from blood, bone marrow, or solid organ transplant; immune deficiencies; HIV; use of corticosteroids; or use of other immune weakening medicines
   - Pregnancy
   - Sickle cell disease
   - Heart conditions, such as heart failure, coronary artery disease, or cardiomyopathies (excludes hypertension)
   - Obesity (BMI>30 kg/m²)
   - Diabetes

2) Disabilities, including those which are developmental, medical, physical, sensory, or behavioral health, including severe mental health and/or substance abuse disorders.

3) Experiencing homelessness, or live or work in a high-risk congregate care facility including correctional facilities, homeless shelters, and other congregate residential care/treatment facilities.

Verification of Eligibility

Vaccinating providers should use reasonable processes to verify that persons presenting for vaccination meet eligibility criteria, while avoiding overly burdensome documentation requirements that create barriers to vaccination.

Healthcare providers vaccinating their own patients can make a reasonable attempt to verify qualifying conditions via the patient’s medical records, and should use clinical judgement in assessing risk even if a patient has not completed evaluation to diagnose qualifying conditions listed above.

Vaccination sites that do not have access to patients’ medical records should not require proof of diagnosis and/or disability, and should recognize that in some circumstances it may be more feasible as well as more equitable to rely instead on obtaining the vaccinee’s self-attestation of their qualifying condition. Vaccinating sites that are serving populations and communities that are disproportionately affected by COVID19 should ensure that access to vaccine is low-barrier.
A sample self-attestation form is posted at www.sfcdcp.org//covidvax-administer.

This communication may be updated if CDPH publishes additional guidance on eligibility verification.

**Ensuring Equitable Distribution**

Vaccinating providers should ensure access for medically and structurally vulnerable groups, using strategies that suit their patient populations, including but not limited to the following:

- Make concerted efforts to outreach to and reduce barriers for residents of priority zip codes and/or demographics that are structurally oppressed: see www.sfcdcp.org/structurallyvulnerable;
- Reserve appointments for certain populations and communities to ensure vaccines are equitably distributed;
- Track demographic data that would help ensure equitable distribution;
- Provide transparent information regarding accommodations for those with disabilities to access a vaccination site;
- Offer several different ways for those with disabilities to book an appointment.

**Additional Information**

**Referring Patients for Vaccination.** Healthcare providers who are not vaccinating entities may direct their patients to https://sf.gov/get-vaccinated-against-covid-19 to check for available vaccination locations and to schedule appointments as they become available. Other options for COVID-19 vaccination includes retail pharmacies (under a new federal program).

**Provider Resources.** Sample COVID-19 vaccine protocols, vaccinator FAQ, and other SFDPH-developed documents as well as links to key vaccination resources are regularly updated and available at www.sfcdcp.org/covidvax-administer

Please email covidvax@sfdph.org with questions.

**Additional Resources**

Health advisories and alerts are posted at www.sfcdcp.org/health-alerts-emergencies/health-alerts/.

See www.sfcdcp.org/covid19hcp for additional COVID-19 information and guidance for San Francisco health care providers.