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April 29, 2022

SAPC INFORMATION NOTICE 22-08
Supersedes Bulletin 22-02

TO: Los Angeles County Substance Use Disorder
SAPC – All Service Providers

FROM: Gary Tsai, M.D., Division Director 
Substance Abuse Prevention and Control

SUBJECT: **COVID-19 VACCINATION REQUIREMENTS AND RESPONSIBILITIES**

The County of Los Angeles Department of Public Health (Public Health), Division of Substance Abuse Prevention and Control (SAPC) is issuing Information Notice #22-08 to provide updates to the requirements and responsibilities for all SAPC service providers and their staff performing duties as part of any SAPC contracts and/or agreements (e.g., Memorandum of Understanding) to be fully vaccinated against COVID-19 as outlined herein. Public Health requirements may exceed those outlined under the [State of California Department of Health Care Services \(DHCS\) Behavioral Health Information Notice No. 22-002](#), and the [California Department of Public Health \(CDPH\)](#). Please refer to the most current [County of Los Angeles Department of Public Health Order of the Health Officer](#).

Vaccination Requirements

All staff working under a Public Health contract or agreement must be fully vaccinated according to the *Primary Vaccination Series* column in the following *Immunization Requirements* table below. This applies to all SAPC provider personnel who: (1) interact in-person with County employees, interns, volunteers, and commissioners; (2) work on County owned or controlled property while performing services under a County contract or agreement; and/or (3) come into contact with the public while performing services under a contract and/or agreement with the County. Unvaccinated or partially vaccinated staff may not provide direct services under any Public Health contract or agreement. This includes, but is not limited to, Prevention, Driving Under the Influence (DUI), Engagement and Overdose Prevention Hubs (formerly known as syringe exchange

programs), Client Engagement and Navigation Services (CENS), and treatment programs, as well as consultants or subcontractors performing duties on behalf of SAPC or its contractors and providers.

Booster Requirements

All health care workers currently eligible for boosters, including those that work in a SAPC treatment setting, must be both fully vaccinated **and** boosted for COVID-19, receiving all recommended doses of the primary series of vaccines and a vaccine booster dose pursuant to the *Immunization Requirements* table below.

Immunization Requirements

COVID-19 Vaccine	All Contractor Staff	All Contractor Staff Working in Substance Use Disorder (SUD) Treatment Settings	
	Primary vaccination series	When to get the vaccine booster dose	Which vaccine booster dose to receive
Moderna or Pfizer-BioNTech	1st and 2nd doses	Booster dose no sooner than five (5) months after 2nd dose	Any of the COVID-19 vaccines authorized in the United States may be used for the booster dose, but either Moderna or Pfizer-BioNTech are preferred
Johnson and Johnson [J&J]/Janssen	1st dose	Booster dose no sooner than two (2) months after 1st dose	Any of the COVID-19 vaccines authorized in the United States may be used for the booster dose, but either Moderna or Pfizer-BioNTech are preferred
World Health Organization (WHO) emergency use listing COVID-19 vaccine	All recommended doses	Booster dose no sooner than five (5) months after getting all recommended doses	Single booster dose of Pfizer-BioNTech COVID-19 vaccine
A mix and match series composed of any combination of the Food and Drug Administration (FDA)-approved, FDA-authorized, or WHO-EUL COVID-19 vaccines	All recommended doses	Booster dose no sooner than five (5) months after getting all recommended doses	Single booster dose of Pfizer-BioNTech COVID-19 vaccine

Exemptions

SAPC provider personnel may be exempt from the vaccination requirements only upon providing their employer (i.e., SAPC provider agency) a declination form, signed by the

individual stating either of the following: (1) the worker is declining vaccination based on Religious Beliefs, or (2) the worker is excused from receiving any COVID-19 vaccine due to a Qualifying Medical Reason.

SAPC provider personnel who are not fully vaccinated and boosted within the timeframes described in the above immunization requirements **and** who have been granted a valid medical or sincerely held religious belief exemption to vaccination by their employer must obtain a negative COVID-19 polymerase chain reaction (PCR) or antigen test every week in order to continue work associated with a Public Health contract and/or agreement. Providers must maintain records of the weekly verification that staff who are not fully vaccinated and boosted, and who have a qualifying exemption, are tested as negative via a PCR or antigen test as evidence that they are in compliance with these requirements and must validate a negative test result prior to their staff coming into contact with the public while performing services under a contract and/or agreement with the County.

SAPC providers must retain all weekly testing documentation for their exempt personnel, which shall be made available to the County upon request.

All SAPC provider personnel must follow the latest guidance from the State and Local Health Officer Orders.

Vaccine Verification

In accordance with all applicable privacy laws, regulations, and [CDPH Guidance for Vaccine Records Guidelines & Standards](#), providers must document and retain verification of the employee's vaccination status and any corresponding testing results. Documentation includes, but is not limited to: 1) full name and date of birth; 2) vaccine manufacturer; 3) date of vaccine administration (for first dose and, if applicable, second dose); and 4) date of vaccine booster administration (if applicable).

Only the following forms of verification will be allowed:

1. Official COVID-19 Vaccination Record Card (issued by the California Department of Health and Human Services, Centers for Disease Control and Prevention [CDC] or World Health Organization [WHO] Yellow Card which includes: 1) the name of person vaccinated; 2) the type of vaccine provided; and 3) the date the last dose was administered); OR
2. A photo of a Vaccination Record Card as a separate document; OR
3. A photo of the client's Vaccination Record Card stored on a phone or electronic device; OR
4. Documentation of COVID-19 vaccination from a health care provider; OR
5. Digital record that includes a QR code that when scanned by a SMART Health Card reader displays to the reader client name, date of birth, vaccine dates and vaccine type; OR

6. Documentation of vaccination from other contracted employers who follow the California Department of Public Health vaccination records guidelines and standards.

Compliance Requirements

As a condition of Public Health contracts and/or agreements, providers must submit the *Certification of Compliance Form*** and attest to mandating staff vaccinations, and when applicable boosters, and identifying any staff who are not fully vaccinated and/or received any required booster as described herein. Providers who do not submit the required certification will be considered in breach of their contract and/or agreement terms and provisions. Providers must establish a policy detailing the organization's process to ensure compliance with this information notice, DHCS, and CDPH guidance. The policy must include the following key areas:

- Vaccine requirements
- Booster requirements
- Criteria for exemptions (if applicable)
- Unvaccinated staff requirements (if applicable)
- Vaccine and testing resources
- Record/Documentation requirements

Providers will also be required to sign the attached attestation form confirming adherence and implementation of the vaccine and booster policy. Providers must be prepared to provide all requested documentation confirming vaccinations and/or exemptions to local, County, and/or State representative(s) or their designee(s) upon request within one (1) business day after receiving the request.

**Note: The Certification of Compliance Form applies to all contractors and providers performing work on behalf of all County Departments.*

Masking

All staff working in healthcare settings, including SUD treatment sites must wear a mask regardless of vaccination status until further notice, per DHCS IN 22-002. Additional requirements outlined in any DPH updated Health Order must also be adhered to.

Resources

Below are additional resources that providers may find helpful while developing and implementing their vaccine policy.

- [Los Angeles County Department of Public Health](#)
- [California Department of Public Health -State of Public Health Officer Order of February 22, 2022](#) and [FAQs](#)
- [LA County Health Officer Health Care Worker Vaccination Requirement](#) and [FAQs](#)

- [CDPH Masking Guidance](#)
- [CDPH Guidance for Vaccine Records Guidelines & Standards](#)
- [FDA COVID-19 Vaccines Webpage](#)
- [February 28, 2022 – CDPH Guidance for the Use of Masks](#)
- [Get the Most out of Masking](#)
- [CDPH Masking Guidance Frequently Asked Questions](#)
- [CDPH Testing Website](#)
- [Self-Isolation Instructions for Individuals Who Have or Likely Have COVID-19 \(CDC\)](#)
- [Interim Guidance for Managing Healthcare Personnel with COVID-19 Infection or Exposure](#)
- [California Department of Public Health Guidance on Local Health Jurisdictions on Isolations and Quarantine of the General Public](#)
- [Guidance on Returning to Work \(Health Facilities\)](#)
- [Responding to COVID-19 in the Workplace for Employers](#)

Effective Period and Next Steps

While this policy is effective immediately, SAPC understands that this change may have a significant impact on your agency's ability to perform essential contracted services amid staffing shortages.

Before your agency takes any action on the employment status of workforce members performing services under a SAPC contract or agreement as a result of this information notice, please contact your assigned Contract Program Auditor with copy to Marika Medrano at mmedrano2@ph.lacounty.gov and include information on your particular circumstances to obtain additional guidance.

As detailed in BH-IN 22-002, in California, covered health care facilities had until February 28, 2022, to ensure that staff have either two doses of COVID-19 vaccine or a valid religious or medical exemption. If your agency has not yet provided SAPC the required Certification of Compliance Form, **your agency must submit the form to your Contract Program Auditor as soon as possible, but no later than close of business on Thursday, May 5, 2022.**

Please contact your assigned Contract Program Auditor for additional information.

GT:mm

Attachment