



September 22, 2022

The Honorable Xavier Becerra  
Secretary  
Department of Health and Human Services  
200 Independence Avenue, SW  
Washington, DC 20201

**Re: Supporting Monkeypox Vaccine Administration and Response at FQHCs**

Dear Secretary Becerra:

We, the undersigned, are writing to request your assistance in supporting monkeypox (MPX) vaccine administration and other response activities at federally qualified health centers (FQHCs) in California. We greatly appreciate the steps that the Biden administration has taken to improve the supply and availability of MPX vaccines, testing, and treatment in California and across the country. However, we are concerned that delays in the Centers for Medicare & Medicaid Services (CMS) approving a reimbursement rate for MPX vaccine administration as well as the lack of dedicated federal funding to support MPX response activities at FQHCs are creating a crisis in access and sustainability at the precise moment when we have an opportunity to get ahead of the outbreak. We are asking for your assistance in ensuring that CMS quickly establishes a fair and equitable vaccine administration rate and allocating additional funding to support MPX response activities at FQHCs as soon as possible.

As you know, MPX is continuing to spread across California and the outbreak is primarily impacting communities that already face significant barriers to accessing culturally competent health care. Like the early days of the HIV epidemic, the LGBTQ+ community is disproportionately affected – with gay and bisexual men accounting for the overwhelming majority of new cases. Over half of all confirmed cases in the state are among Blacks and Latinos and roughly 40% are among people living with HIV.<sup>1</sup> While there has only been one confirmed death associated with the current outbreak in California, a monkeypox diagnosis can result in debilitating pain, emotional trauma, and crippling financial consequences. FQHCs are on the front lines of the MPX outbreak and adjusting clinical operations to meet the demands of this growing public health emergency. Our staff have been working around the clock to provide the LGBTQ+ community with desperately needed education and resources, testing, vaccination, treatment, and other support services.

While MPX vaccines are being distributed by the federal government at no cost, FQHCs are currently not being reimbursed for vaccine administration when it occurs outside of a billable visit. FQHCs generally administer MPX vaccines outside of a primary care visit by a non-billable provider to reach a significantly greater number of patients on a daily basis. During the COVID-19 public health emergency, CMS recognized the unique costs associated with vaccine administration at FQHCs and allowed for reimbursement of vaccine-only visits above the applicable Prospective Payment Systems (PPS) rate. On March 2, 2022, CMS approved State Plan Amendment (SPA) 21-0020 for reimbursement of COVID-19 vaccine-only visits – with a required reimbursement rate of \$67 per shot rather than the proposed \$40 rate.<sup>2</sup>

The California Department of Health Care Services (DHCS) recently proposed SPA 22-0062 to reimburse FQHCs a supplemental amount for MPX vaccine-only visits above the applicable PPS rate effective August 17, 2022.<sup>3</sup> We are requesting your assistance in ensuring that CMS approves the SPA as quickly as possible so that FQHCs can be reimbursed for the thousands of vaccine doses administered to date. In addition, we ask for your help in ensuring that the approved reimbursement rate accounts for the unique and additional costs associated with MPX vaccine administration at FQHCs. Such costs include hiring additional or temporary staff, training, outreach and education to address vaccine hesitancy, storage capacity, patient transportation, and lost revenues for redeploying staff. FQHCs have been dedicating staff not only to administer MPX vaccines, but also to schedule appointments, perform outreach for both doses, and support patient monitoring.

In addition, we urge the Department of Health and Human Services (HHS) to do everything in its power to release dedicated funding to support MPX response activities at FQHCs as quickly as possible. We are in full support of the White House's additional request for \$4.5 billion to meet the critical needs of the MPX outbreak and believe it is critical that a portion of these funds – if approved – are allocated to FQHCs to support current and expanding MPX education, vaccination, testing, and treatment efforts. FQHCs are critical partners in ensuring that MPX vaccines, in particular, are administered quickly and equitably. FQHCs have longstanding,

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<sup>1</sup> Monkeypox Data in California. Available at: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/Monkeypox-Data.aspx>.

<sup>2</sup> California State Plan Amendment 21-0020. Available at: <https://www.dhcs.ca.gov/Documents/COVID-19/SPA-CA-DR-21-0020.pdf>.

<sup>3</sup> California State Plan Amendment 22-0062. Available at: <https://www.dhcs.ca.gov/formsandpubs/laws/Documents/SPA-22-0062-Pending.pdf>.

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. FQHCs must be provided with the resources needed to respond to the MPX outbreak with the urgency and attention it deserves.

We appreciate the Biden administration's attention to this important issue and look forward to our continued work together to ensure that our nation's most vulnerable have access to MPX testing, vaccination, and treatment. If you have any questions, please contact Craig Pulsipher at [cpulsipher@aplahealth.org](mailto:cpulsipher@aplahealth.org).

Sincerely,

AltaMed Health Services  
APLA Health  
California Community Foundation  
CaliforniaHealth+ Advocates  
Community Clinic Association of Los Angeles County  
DAP Health  
Kedren Health  
Kheir Clinic  
Los Angeles LGBT Center  
Northeast Valley Health Corporation  
Radiant Health Centers  
San Francisco AIDS Foundation  
SoCal Grantmakers  
St. John's Community Health  
To Help Everyone (T.H.E.) Health and Wellness Centers  
Watts Healthcare Corporation  
Wesley Health Centers (JWCH Institute)  
Western Center on Law & Poverty

cc: Bob Fenton, National Monkeypox Response Coordinator  
Dr. Demetre Daskalakis, National Monkeypox Response Deputy Coordinator  
Chiquita Brooks-LaSure, Centers for Medicare & Medicaid Services Administrator