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**SAPC BULLETIN 22-02**  
*Superseded by IN 22-08*

January 1, 2022

TO: Los Angeles County Substance Use Disorder  
Contracted 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 Bulletin #22-02 to update the requirements and responsibilities for all contracted service providers and their staff performing duties as part of any SAPC contract to be fully vaccinated against COVID-19 without exception as outlined herein. As such, Public Health requirements exceed those outlined under the Urgency Ordinance passed by the Los Angeles County Board of Supervisors on December 7, 2021, State of California Department of Health Care Services (DHCS) Behavioral Health Information Notice No. 21-043, and the California Department of Public Health (CDPH).

**Vaccination Requirements**

All provider staff working under a Public Health contract and working at a contractor site must be fully vaccinated according to the *Primary Vaccination Series* column in the following *Immunization Requirements* table below. This applies to all Contractor 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; and/or (3) come into contact with the public while performing services under a contract with the County. Unvaccinated or partially vaccinated staff may not provide 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.

### **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 6 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 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 6 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 FDA-approved, FDA-authorized, or WHO-EUL COVID-19 vaccines	All recommended doses	Booster dose no sooner than 6 months after getting all recommended doses	Single booster dose of Pfizer-BioNTech COVID-19 vaccine

### **Testing as an Alternative to Vaccination**

Public Health and Public Health-SAPC are unable to accept and accommodate COVID-19 testing as an alternative to the vaccination requirement for any contractor staff and/or their subcontractors/consultants when performing duties as part of a Public Health or Public Health-SAPC contract or agreement (e.g., MOU). Staff not fully vaccinated and boosted in accordance with the table above may be transitioned to perform other duties not associated with Public Health contracts or may be assigned Public Health contracted work performed exclusively at a non-contractor site via telework or an approved telehealth platform.

## **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(s) 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, 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 terms and provisions.

Providers must establish a policy detailing the organization's process to ensure compliance with this bulletin, DHCS, and CDPH guidance. The policy must include the following key areas:

- Vaccine requirements
- Booster requirements
- Criteria for exemptions (if applicable and including language adhering to the prohibition of providing services under a DPH contract or agreement, or their assignment to exclusively work via telehealth or telework)

- Unvaccinated staff requirements (if applicable and including language adhering to the prohibition of providing services under a DPH contract or agreement, or their assignment to exclusively work via telehealth or telework)
- 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 performing work on behalf of all County Departments and thus includes language on testing options that are not applicable to Public Health and Public Health-SAPC.*

### **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 21-043. 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 December 22, 2021](#) 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](#)
- [July 28, 2021 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 Self-Isolation Instructions for Individuals with COVID-19](#)
- [Guidance on Returning to Work or School Following COVID-19 Diagnosis](#)
- [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 in an environment where there are already experienced 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 bulletin, please contact your assigned Contract Program Auditor with copy to Daniel Deniz at [ddeniz@ph.lacounty.gov](mailto:ddeniz@ph.lacounty.gov) and include information on your particular circumstances to obtain additional guidance.** The *Certification of Compliance Form* also needs to be submitted by January 1, 2022.

Please contact your assigned Contract Program Auditor for additional information.

GT:dd

c: County Counsel

Attachment