

Blueprint for a Safer Economy



COVID-19 County Tier Adjudication Request FOR

Requested week for Tier Assignment Adjudication:

Background

On August 28, 2020, Governor Gavin Newsom unveiled the [Blueprint for a Safer Economy](#), a statewide, stringent and slow plan for a safe progression of opening more businesses and activities in light of the pandemic. The plan imposed risk-based criteria on tightening and loosening COVID-19 allowable activities and defined a minimum length of time between changes to assess how any movement affects the trajectory of the disease based on a county's disease transmission metrics. As part of this framework, a county tier adjudication process was established to offer local jurisdictions the opportunity to raise questions concerning data discrepancies or other similar errors in the tier assignment process.

A county may submit this form as an official request to enter into a tier adjudication process.

Timing and Processing of An Adjudication Request

Counties must submit their intent to request tier adjudication no later than Monday at 6pm regarding their tier metrics for that week. The full county tier adjudication form & any supporting documentation must be submitted by Wednesday at 5pm. Once a county enters into tier adjudication with CDPH, the county's tier assignment at the time of the request will be held in the current tier until adjudication is complete.

An adjudication process cannot delay a tier change by more than one tier reporting period (the process cannot cross beyond the next Tuesday's tier assignment), and the county will be assigned to the tier determined by CDPH no later than Monday of the following week. If a request for adjudication concerns movement from Tier 2 to Tier 1, schools in the county that have not yet reopened may not reopen during tier adjudication.

The State Health Officer or designee will review and approve the final decision. CDPH will also post the request form and a summary of the final decision on the [CDPH website](#) after the county tier adjudication request package (completed form and supporting documents) and discussion between State and local officials have been completed.

Reason for Adjudication Request- select all that apply and provide an explanation:

- DATA DISCREPANCY:** Using similar methodology for calculating the blueprint metrics, the county identifies a discrepancy between state and local data.
 - Does the discrepancy pertain to adjusted case rate, test positivity or both?
 - Please describe any additional detail pertaining to the discrepancy.
 - If the data discrepancy involves non-ELR data, please refer to Appendix A for instructions on the format and information that should be included as supporting documentation.

Please enter relevant information for States consideration

Other additional justification to be considered:

Please provide relevant qualitative/contextual elements for the States consideration

In addition to your county's completed COVID-19 COUNTY TIER ADJUDICATION FORM, please include:

- Supporting data documentation following the instructions in Appendix A
 - How many separate documents will be provided, excluding this form, in connection with this request: _____
 - Please list names of any files being provided to ensure we have everything you intend to have reviewed in connection with this request:

A completed data summary table (see [Appendix A](#))

Note: if a County is delayed in its submission of required information to inform the adjudication process, CDPH can elect to end or deny the adjudication request.

Instructions for submission:

1. Submit request for tier adjudication to CDPH at countytieradjudication@cdph.ca.gov no later than Monday, 6pm.
2. Submit county tier adjudication form, data summary table, and supporting documents, as separate documents, to CDPH no later than by 5pm Wednesday (within 2 days after the request for tier adjudication was sent) at countytieradjudication@cdph.ca.gov.
3. Data file should be sent encrypted. Does not need to be in zipped files.

I _____ hereby attest that I am duly authorized to sign and act on behalf of _____. I certify that the information provided in the county tier adjudication request is true, accurate and complete to the best of my knowledge.

I understand and consent that the California Department of Public Health (CDPH) will post this information on the CDPH website and is public record.

Printed Name _____

Signature _____

Position/Title _____

Date _____

CDPH Determination

Date of Determination: _____

Appendix A:

Format Requested: Excel Files (send encrypted email if contains PHI)

1. Metric: Adjusted Case rate discrepancy- related adjudication

Fields that we need information on:

Test Submitter	Episode Date*	Unique Case IDs	ELR or non-ELR	Test info (positive/negative)	Confirmation of Address (county suffices) of case
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* Data should align with dates used for CDPH tier assignment.

2. Metric: Testing Positivity and/or Volume discrepancy- related adjudication

Fields that we need information on:

Test Submitter ¹	Specimen collection date*	Unique Case IDs	ELR or non-ELR	Test info (positive/negative)	Type of test used (PCR/Antigen/POC)	Confirmation of Address (county suffices) of case
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* Data should align with dates used for CDPH tier assignment.

Download the [Tier Adjudication Summary Table](#) (Excel)

¹ Counties are requested to submit a list of labs that are not reporting to CalREDIE via ELR or CalREDIE compatible csv files. Please indicate if these labs are currently in the process of onboarding onto CalREDIE.

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Form Updated 10/20/20

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Form Updated 10/20/2020

Blueprint for a Safer Economy



COVID-19 County Tier Adjudication

For the county of: Sacramento

Requested week for Tier Assignment Adjudication: 11/04/2020

Summary

Sacramento County requests tier adjudication on the grounds of data discrepancy pertaining to both the adjusted case rate and the positivity rate. County states that the discrepancy in the adjusted case rate incorrectly pushed Sacramento County into the Purple Tier (Tier 1) for the 11/4/2020 tier assignment week.

County states that the source of the discrepancy is at minimum 40 apparent false positive SARS-CoV-2 results. An unusually high number of positive PCR test results were noted among asymptomatic individuals, including several staff at a long-term care facility (LTCF), thus alerting the County to a potential problem with either the collection and transport of specimens or the validity of some tests performed by the laboratory. The LTCF collected a separate specimen from each of the 40 individuals about 24 hours following the initial specimen collection. All 40 of these specimens returned negative PCR results for SARS-CoV-2 at Pacific Medical Laboratory (PML). The County coordinated sending ten of the original specimens to VRDL for re-testing. Nine of the ten samples returned positive but with a cycle threshold (CT) value of >33 and one was inconclusive using the CDC rRt-PCR assay. Specimens were only retained by the laboratory for three days, so the other specimens were not available for re-testing.

The same lab also reported 189 positive cases for the time period associated with the 11/4/2020 tier assignment week.

County epidemiologists pulled data from CalREDIE on 11/4/2020 and used similar methodology as the State to calculate the possible range of true adjusted case rate for disease for the 11/4/2020 tier assignment week. County is assuming that if all 189 cases were false positives, the adjusted case rate would

be 6.0 per 100,000, which would be below the 7.0 requirement to remain in the Red Tier (Tier 2).

County also reported that, excluding the potential false positives, a substantial number of additional cases (52) were among residents of skilled nursing/long-term care facilities. County requests removing these cases as they are likely to be contained, focalized clusters. Removal of these 52 cases would have brought down their adjusted case rate down to 6.8 per 100,000.

County also believes their test positivity rate is solidly in Orange Tier despite being inflated due to a large volume of negative labs not being reported via electronic laboratory reporting (ELR). County reports that one lab alone, which services their high-volume drive-through testing site, had 2,449 unreported negative labs for the 11/4/2020 tier assignment week. County also reports that there are other labs not reporting negatives via ELR, including an unknown volume from the VA Hospital.

The County is currently working with the State and the local labs to investigate the source and extent of the problem with potential false positive SARS-CoV-2 test results, including performing confirmatory testing at the Sacramento County Public Health Laboratory on a random sampling of positive tests.

County requested a temporary hold of at least two weeks on movement to a Purple Tier to allow them adequate time to investigate the apparent false positive test results and to ascertain if their case counts stabilize after containment of the recent LTCF clusters.

Removing the 40 reported positives under additional investigation from their case count does not change the county's assigned tier metrics for the week of 11/4/2020 tier assignment. Moreover, the investigation into the 189 positives is still pending and CDPH cannot assume that the results are false positives. Sacramento County case rate metrics continue to reside in the Purple tier range.

Determination

Sacramento County's adjudication request is not approved for the 11/4/2020 tier assignment week. Sacramento County metrics for the 11/4/2020 tier assignment week will remain in the Purple Tier.

Date of CDPH Determination: 11/08/2020