



1615 Capitol Ave., Suite 73.771
P.O. Box 997377, MS 7003
Sacramento, CA 95899-7377

PHONE: 916.440.7594
FAX: 916.440.7595
<http://www.cclho.org>

Jake Hanson, MPH
Executive Administrator
Jake.Hanson@cdph.ca.gov

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April 29, 2021

Tomas J. Aragon, MD, MPH
Director and State Public Health Officer
California Department of Public Health
1615 Capitol Avenue, Suite 73.720
Sacramento, CA 95814

Dear Dr. Aragon,

The California Conference of Local Health Officers (CCLHO) would like to thank the California Department of Public Health (CDPH) and the Third Party Administrator (TPA) – Blue Shield for their role in distribution of the COVID-19 vaccine. CCLHO respectfully requests that the TPA vaccine provider network not be used to administer vaccines to Californians younger than 16 years old during the next phase of the COVID-19 vaccine rollout. Moving forward, CCLHO believes that the TPA should be phased out rather than expanded.

As the Food and Drug Administration considers Emergency Use Authorization for the Pfizer vaccine for people as young as 12, California needs a plan for vaccinating adolescents, and eventually children, against COVID-19. CCLHO believes that rather than creating a new network, the most effective and efficient way to vaccinate children and adolescents against COVID-19 will be to utilize their current providers. The Vaccines for Children (VFC) Program is ideally suited to serve as the backbone of the COVID-19 vaccine administration for children and adolescents. The VFC program serves hard-to-reach populations, allowing it to create vaccine equity.

CCLHO encourages you to advocate within the current administration for use of the VFC provider network rather than the TPA network for administering COVID vaccines to California's children and adolescents. Exceptions to usual VFC rules could be made to allow the COVID-19 vaccine to be administered to all children regardless of insurance coverage. CDPH's Immunization Branch, local health departments, and the VFC network have expertise and experience unrivaled by other administrators and providers.

CCLHO was established in statute in 1947 to advise the California Department of Health Services (now California Department of Public Health), other departments, boards, commissions, and officials of federal, state and local agencies, the Legislature and other organizations on all matters affecting health. CCLHO membership consists of all legally appointed physician health officers in California's 61 city and county jurisdictions.

Sincerely,

Karen Relucio, MD
President, California Conference of Local Health Officers

