

## Equitable Vaccination for People at High Risk for COVID in California

We, the undersigned organizations, urge the State of California, individual cities and counties, and all health care providers to implement the state's high-risk COVID-19 vaccination policy as equitably as possible. The policy states that people in certain high-risk categories will be eligible on March 15, so critical plans must be made before then. Equity means not only expanding eligibility to people with certain disabilities or conditions, but focusing on people who are Black, Latinx, indigenous, poor, unhoused, incarcerated, and/or underresourced in other ways. We call on the State, cities and counties, and health care providers to implement the following criteria immediately:

- Allow a document showing a high-risk condition OR allow self-certification (don't exclusively rely on physical appearance as high risk conditions include non-visible disabilities). Recognize the challenges faced in getting a doctor's certification, including, but not limited to, accessibility, provider bias, and language barriers. Eligible categories should include:
  - Fat/Higher-weight (without reference to BMI)
  - Developmental or intellectual disability (include autism, cerebral palsy, muscular dystrophy, spina bifida, and additional disabilities acquired before age 22)
  - Immunocompromised
  - Anyone receiving home and community-based services/home care/assistance with activities of daily living, including, but not limited to, IHSS, Regional Center, paid or unpaid caregiving
  - Anyone with a condition on the full CDC list
  - A person with a significant disability that places them at high risk for life-threatening outcomes or death from COVID-19, even if the disability is not specifically listed (for example, schizophrenia) or studied yet.
  - A person with multiple pre-existing conditions that in combination put them at high risk for life-threatening outcomes or death from COVID-19.
  - A person with a disability who gets regular medical care that will be cancelled or inaccessible if the person were to get COVID.
  - A person with a disability for whom providing adequate and timely COVID care would be challenging if they were to get COVID, such as: people who are nonverbal; people who cannot follow medical instructions such as keeping an oxygen mask on; people who use a CPAP or BiPAP; and people who need to be accompanied by an in-person supporter. For details, see <https://dredf.org/faq-covid-19-vaccines-and-californians-with-disabilities/>
- Allow eligible people to go to **any** vaccination site ("no wrong door").

- Make mobile / “house-call” vaccination available for people who cannot get to a vaccination site and people who cannot leave their homes.
- Make registering for an appointment and verifying eligibility easy and available to all, including people who speak a language other than English, use ASL, and/or do not have internet or cell phone access.
  - Registration websites and phone systems must be fully accessible to people who use screen readers, video conferencing, or other assistive technology, according to the Americans with Disabilities Act.
- Vaccine providers should prioritize BIPOC and poor people who are at high-risk.
- Have a clear plan that presents minimal barriers (e.g., need to present personal identification) to vaccinate disabled and other high-risk people who are unhoused, in jail or prison, in immigrant detention centers, or in other congregate settings.
- Allow eligible people to set up appointments BEFORE March 15, to start vaccination on March 15.
- Track and compile data, including age, race, ethnicity, and gender, on how many people get vaccinated in high-risk categories, and where people in these groups are being vaccinated.

The undersigned organizations are available to consult with government entities and health care providers and/or to provide additional information on specifically how these criteria can be implemented effectively.

Signed,

Senior and Disability Action  
Disability Visibility Project  
The Arc San Francisco  
California Alliance for Retired Americans  
Choice in Aging  
Hand in Hand: The Domestic Employers Network  
Disability Rights Education & Defense Fund