



California's Protection & Advocacy System
Toll-Free (800) 776-5746

Electric Utility Power Shutoffs

June 2021, Pub. #7169.01

1. [Background](#)
2. [Do I live in a high-fire threat district?](#)
3. [What are Medical Baseline Programs?](#)
4. [Utility Back-up Power and Resiliency Programs](#)
5. [What is the California Foundation for Independent Living Centers: Disability Disaster Access and Resource Center?](#)
6. [What is the California Public Utilities Commission Self-Generation Incentive Program?](#)
7. [Can I get a loan for a generator or backup batteries?](#)
8. [Will Medi-Cal or Medicare cover generators or backup batteries?](#)
 - a. [Will a Medi-Cal waiver cover generators or backup batteries?](#)
9. [Complaints](#)
10. [COVID-19 Financial Relief Programs](#)
11. [Additional Resources](#)

If you have an emergency or are in trouble, call 911. Disability Rights California cannot help you evacuate or stay safe.

1. BACKGROUND

Electricity is necessary to power the devices we rely on daily. These devices are essential for a person's health and safety. In 2012, the California Public Utilities Commission ruled that California Public Utilities Code Section 451 and 399.2(a) give electric utilities authority to shut off the electric power to protect public safety.ⁱ Energy companies can shut off power for the prevention of fires where strong winds, heat events, and related conditions are present.ⁱⁱ This includes, San Diego General and Electric (SDG&E), Pacific Gas and Electric (PG&E), Southern California Edison (SCE), Liberty, Bear Valley, and PacifiCorp.

Accordingly, utility companies may proactively cut power to electrical lines that may fail in certain weather conditions to reduce the likelihood that their infrastructure could cause or contribute to a wildfire. When a utility company turns off power for one of these reasons, it is a Public Safety Power Shutoff (power shutoff event). A power shutoff event can leave persons and facilities without power. These events pose significant challenges to the health, safety, and wellbeing of persons with disabilities and other individuals who are part of the "Access and Functional Needs (AFN)" community.

The Access and Functional Needs community are persons who have:

- developmental or intellectual disabilities,
- physical disabilities,
- chronic conditions,
- injuries,
- limited English proficiency or who are non-English speaking,
- older adults,
- children,
- people living in institutionalized settings,
- those who are low income,
- homeless,
- transportation disadvantaged (including those who are dependent on public transit), or
- those who are pregnant.ⁱⁱⁱ

Current guidelines instruct utility companies to consider the needs and input of the AFN community, including vulnerable populations and current and potentially eligible medical baseline customers. During a

power shutoff event, the guidelines instruct utility companies to take specific actions for the Access and Functional Needs (AFN) population.^{iv} For electricity dependent persons, power shutoff events can quickly turn into dangerous situations.

[Click here](#) to learn about Bear Valley Electric Service (BVES) PSPS programs.

[Click here](#) to learn about Liberty Utilities (CalPeco Electric) PSPS programs.

[Click here](#) to learn about PacifiCorp's PSPS programs.

[Click here](#) to learn about PG&E PSPS programs.

[Click here](#) to learn about SCE PSPS programs.

[Click here](#) to learn about SDG&E PSPS programs.

Disability Rights California recognizes that the populations affected by power shutoff events is broad. The term "Access and Functional Needs (AFN)" community does not include all the populations affected by power shutoff events. In creating a power shutoff emergency preparedness plan, it is important to assess individual needs, identify resources, and plan ahead. This publication provides resources for accessing power during power shutoff events.

2. Do I live in a high fire-threat district?

California regions have experienced increasingly devastating wildfires in the last decade. There are environmental factors that create greater fire hazard in specific areas. These factors include vegetation, topography, weather, ember production and movement, and likelihood of fire.^v Every person should have an emergency preparedness plan. Part of that plan should include knowing whether you live in a high fire-threat district.

[Click here](#) to determine if you live in a high fire-threat district (map maintained by the California Public Utilities Commission).

3. What are Medical Baseline Programs?

Participation in a medical baseline program is important to ensure you receive notification of upcoming or current power shutoff events. The Baseline Act of 1976 established Medical baseline to provide larger quantities of power at the baseline rate to residential customers who have special needs and/or are dependent on life-support equipment.^{vi} These programs provide a medical baseline allowance, which can lower electricity costs.^{vii} Customers enrolled in medical baseline programs receive additional notifications about power shutoff events.

[Click here](#) for Bear Valley's medical baseline program.

[Click here](#) for Liberty Utilities (CalPeco Electric) medical baseline program.

[Click here](#) for PacifiCorp's medical baseline program.

[Click here](#) for PG&E's medical baseline program.

[Click here](#) for SCE's medical baseline program.

[Click here](#) for SDG&E's medical baseline program.

[Click here](#) for SoCalGas's medical baseline program.

These utility companies offer additional notice of power outages to baseline customers. Additional notice can include, extra phone calls, in-person notifications, or advanced notifications. Each program offers different services and has different requirements. After enrolling in a medical baseline program, it is important to confirm you have opted-in to power shutoff event notifications and ensure your profile information is correct.

4. Does my utility provider have customer programs and resources?

Regulations require utility companies to create a yearly plan to support access and functional needs populations during PSPS power shutoff events. In creating an emergency preparedness plan, it is important to identify programs that you qualify for. In addition to medical baseline programs, utility companies are beginning to offer programs and

resources to customers who are vulnerable because of the impact of power shutoff events. The section below identifies some of the programs offered by SDG&E, PG&E, and SCE.

SDG&E (provider for San Diego and Orange County):

[Click here](#) for SDG&E's plan to support access and functional needs populations during public safety power shutoffs (updated February 2021).

SDG&E provides customer programs and resources for customers made vulnerable by power shutoff events. SDG&E is partners with **2-1-1 San Diego and 2-1-1 Orange County** to provide resources for AFN during power shutoff events.

The services available for customers with AFN include:

- referral of customers to resources for assistance with services such as evacuation planning;
- Additional services including hotel stays, assisted transportation, food security, welfare checks and delivery of resiliency items;
- Navigation support (e.g., personalized case management and follow-up for impacted individuals with the greatest need);
- Outreach campaign to customers in advance of and during PSPS events through a broad range of communications channels; and
- Proactive community engagement outside of the fire season to ensure AFN individuals have the resources they need ahead of time.

In addition to 2-1-1, SDG&E contracts with **Jewish Family Services Partnership** to provide support services to vulnerable populations during power shutoff events. During a power shutoff event, JFS provides services to impacted AFN customer from 7:00 am- 10:00 pm, 7 days a week. The 2-1-1 referral network will refer customers to JFS on an as needed basis.

Available services include:

- Welfare checks
- Shelf-stable food and ice
- Delivery of resiliency items or kits
- Transportation to a safe location
- Temporary lodging

Lastly, Facilitating Access to Coordinated Transportation (FACT) San Diego provides accessible transportation to those in need. SDG&E contracted with **Facilitating Access to Coordinated Transportation (FACT)** for enhanced and wheelchair transportation for people with AFN before and during power shutoff events. This partnership will continue through 2021. The partnership extends hours of operation during power shutoff events from 5:30 am to 11:00 pm, 7 days a week. The 2-1-1 referral network coordinates these calls.

SDG&E recently launched **County OES Neighborhood Evacuation Teams (NET)** which consist of local Community Emergency Response Team (CERT) members. CERT members can help you complete a Disaster Preparedness Plan. The program focuses on those who need assistance evacuating during emergencies. The Neighborhood Evacuation Team (NET) pairs trained Community Emergency Response Team members with individuals in their community who may have difficulty self-evacuating during an emergency (i.e., older adults with limited mobility, people with various disabilities, limited transportation resources, or other access and functional needs).

Neighborhood Evacuation Team members can help you:

- Prepare and review your evacuation plan;
- Identify emergency contacts;
- Register for AlertSanDiego and learn more about other emergency communication tools; and
- Connect you with other resources to help you be better prepared for disasters.

[Click here](#) to request assistance from NET (not an emergency service).

There are programs like this in many communities throughout California. [Click here](#) to see if your community has a CERT program.^{viii}

SDG&E Generator Grant Program (GGP) provides back-up battery units to customers with enhanced vulnerability to PSPS power shutoff events. The program offers a Goal Zero Yeti 3000X Portable Power Station, coupled with a Boulder 100 Briefcase solar module that produces power to recharge the unit.

Who is eligible for the Generator Grant Program (GGP)?

- Medical Baseline Customers who:
 - self-identified as having a disability,
 - reside in a Tier 2 or 3 HFTD, and
 - experienced 1 or more PSPS events in 2019 or 2020.

SDG&E invites customers to participate in the program by sending emails and letters. SDG&E sends invitations to eligible customers beginning in May. SDG&E continues to send invitations on a rolling-basis until July. If an SDG&E customer has not received an invitation but thinks they are eligible, they should call RHA at (619) 387-4757 or email ggpcustomerinterest@rhainc.com.

If you have general questions about the program, email SDG&E's Energy Savings Center at (800) 644-6133 or email SDG&E at GeneratorInquiry@sdge.com.

SDG&E's Resiliency Assistance Program offers rebates to an expanded segment of customers in High Fire Threat Districts (HFTD) tier 2 or 3 who experienced one or more 2019 or 2020 PSPS outage events. The program offers an instant online rebate on a portable generator. The program offers a \$300 rebate to customers who meet the basic eligibility criteria of residing in the HFTD and having experienced a recent PSPS-related outage. In addition, the program offers an additional \$150 for qualified California Alternate Rates for Energy (CARE) customers. The 2021 program will continue to target AFN low-income customers with enhanced rebates on portable generators, well pump backup generators, and portable power stations.

If you have general questions about the program, call SDG&E's Energy Savings Center at (800) 644-6133 or email SDG&E at GeneratorInquiry@sdge.com. If you would like to see if you qualify, visit [here](#).

PG&E (provider for Northern and Southern California Counties^{ix}):

[Click here](#) for PG&E's plan to support access and functional needs populations during public safety power shutoffs (updated February 2021).

PG&E partners with the California Foundation for Independent Living Centers' (CFILC), which created the **Disability Disaster Access and Resources Program (DDARP)**. The partnership is a readiness program to support people with disabilities and older adults before, during, and after a PSPS power shutoff event. Local Independent Living Centers (ILCs) coordinated by the CFILC implement DDAR. ILCs support people with disabilities, medical and independent living needs, and older adults.

Services provided by the ILCs:

- providing program outreach;
- assessments;
- personalized emergency planning discussions; and
- delivering portable batteries to those who qualify.

CFILC power shutoff in-event support services for qualifying customers includes:

- providing hotel accommodations;
- accessible transportation to hotels and Community Resource Centers (CRCs);
- food vouchers;
- gas cards for fuel; and
- backup batteries.

There are various options for batteries. Long-term loan programs, short term loan programs, lease to own, and financial loan programs provide batteries to qualifying customers. The CFILC also responds to Medical Baseline customer escalations received from PG&E's Call Center during PSPS events and provides the above-mentioned resources accordingly.

[Visit here](#) for the DDARP Power Safety Shutoff Resources Application (including back-up batteries).^x

The DDARP will determine who qualifies for resources through an intake process. Qualification criteria includes people with disabilities and chronic conditions that require electricity to live independently. PG&E customers are encouraged to reach out to their local DDARP center well in advance of a power shutoff event. Individuals can visit [here](#) for additional information.

PG&E launched the **Portable Battery Program (PBP)** in August 2020. The Program provides support for low-income, Medical Baseline customers, and other people with disabilities and AFN populations that are higher risk for PSPS power shutoff events. The program is a collaboration between PG&E and five Low-Income Home Energy Assistance Program providers and Richard Heath & Associates. The PBP enables qualifying customers who use electrical medical devices to access portable back-up batteries.

To qualify, a PG&E customer must:

- have enrolled in Medical Baseline and California Alternative Rates for Energy (CARE) or Family Electric Rate Assistance (FERA),
- reside in a High Fire Threat District (HFTD) or have experienced 2+ PSPS events, and
- rely on medical equipment that operates on electricity to sustain life.

PG&E customers do not need to apply for the PBP program. PG&E's partner organizations perform direct outreach to customers that are eligible. Partner organizations contact eligible PG&E customers through phone, mail, and/or email. After eligibility is determined, PG&E's partner organizations conduct an assessment. During the assessment, partner organizations determine the right size battery for the power needs of

your equipment and discuss emergency preparedness plans. If the power requirement of the medical device(s) exceeds the capacity of a portable battery, PG&E partner organizations will refer the customer to the Disability Disaster Access & Resources (DDAR) program.

[Visit here](#) to learn more about PG&E’s back-up battery programs.

[Click here](#) for PG&E’s medical baseline program.

[Click here](#) for PG&E’s CARE and FERA programs.

Individuals who have questions or believe they are eligible but have not been contacted by PG&E’s partner organizations can reach out to the below PBP providers:

Organization	Counties Served	Contact
Butte Community Action Agency	Butte	buttecaa.com ; pgebatteryprogram@rhainc.com ; 1-800-989-9744; 1-530-712-2600
Central Coast Energy Services	Marin, Monterey, San Benito, San Mateo, Santa Clara, Santa Cruz	energyservices.org/pmps ; PSPS@EnergyServices.org ; 1-800-564-4012
Community Resource Project	Yuba	communityresourceproject.org ; 1-833-232-3355
North Coast Energy Services	Lake, Mendocino, Napa, Solano, Sonoma, Yolo	nces.org ; kheath@nces.org ; 1-800-233-4480; 1-707-463-0303
Redwood Community Action Agency	Humboldt	rcaa.org ; cdriscoll@rcaa.org ; 1-707-269-2001

<p>Richard Heath and Associates</p>	<p>Alameda, Amador, Butte, Calaveras, Colusa, Contra Costa, El Dorado, Fresno, Glenn, Kern, Lassen, Madera, Mariposa, Nevada, Placer, Plumas, San Joaquin, San Luis Obispo, Santa Barbara, Shasta, Sierra, Siskiyou, Tehama, Trinity, Tulare, Tuolumne</p>	<p>pgebatteryprogram.com; pgebatteryprogram@rhainc.com; 1-800-989-9744</p>
-------------------------------------	--	---

During a PSPS power shutoff event, PG&E opens **Community Resource Centers** in impacted counties and tribal communities. CRCs are open from 8:00 am- 10:00 pm. CRCs provide basic support such as information cards, water, and snacks. However, PG&E states their CRCs also provide medical device charging stations and power strips for basic charging needs.^{xi}

SCE (provider for Southern California Counties^{xii}):

[Click here](#) for SCE’s plan to support access and functional needs populations during public safety power shutoffs (updated February 2021).

SCE provides customer programs and resources during PSPS power shutoff events. SCE started the **Critical Care Battery Back-Up (CCBB) Program** in the summer of 2020. The program provides a right-sized, fully subsidized portable back-up battery to eligible customers. The program serves SCE’s population of customers who use medical equipment who live on limited incomes and otherwise may not have the ability to purchase a key piece of equipment to help ensure their resiliency during emergencies, such as PSPS power shutoff events.

To qualify, a SCE customer must:

- have enrolled in Medical Baseline and California Alternative Rates for Energy (CARE) or Family Electric Rate Assistance (FERA), and
- reside in a High Fire Risk Area. [Click here](#) to determine if you live in a high fire risk area.

If you have general questions about the program, call SCE's Customer Center at (800) 736-4777.

[Click here](#) for SCE's Back-Up battery program.

[Click here](#) for SCE's Medical Baseline program.

[Click here](#) for SCE's CARE and FERA programs.

[Click here](#) for SCE's other wildfire resources.

Bear Valley Electric Services

[Click here](#) for Bear Valley's plan to support access and functional needs populations during public safety power shutoffs (updated February 2021).

PacifiCorp

[Click here](#) for PacifiCorp's plan to support access and functional needs populations during public safety power shutoffs (updated February 2021).

5. What is the California Foundation for Independent Living Centers: Disability Disaster Access and Resource Center?

The California Disaster Strategies Coalition is a broad group of community service providers and advocates working on inclusive emergency planning, response, recovery, and mitigation.^{xiii} Disability Disaster Access and Resource Centers (DDARC) provide resources for PSPS power shutoff events and other natural disasters. These resources include information on backup power for electricity-powered medical equipment.

[Click here](#) to visit the DDARC website.

[Click here](#) to find the DDARC in your region.

<https://disabilitydisasteraccess.org/wp-content/uploads/2020/08/ddar-backup-battery-options-08182020-OPTIMIZED.pdf>.

<https://disabilitydisasteraccess.org/public-safety-power-shutoffs/>.

6. What is the California Public Utilities Commission Self-Generation Incentive Program?

The California Public Utilities Commission Self-Generation Incentive Program (SGIP) is available to PG&E, SCE, SoCalGas, and SDG&E customers. This statewide program offers rebates for installing energy storage technology at both residential and non-residential facilities. Funding includes prioritization of communities living in high-fire threat areas. These are communities that have experienced two or more utility PSPS events, as well as low income, and medically vulnerable customers. The SGIP program has two tiers, Equity and Equity Resiliency.

The Equity tier of the program will rebate approximately 85 percent of the cost of the average energy storage system. The Equity Resiliency tier rebate covers close to 100 percent of the cost of an average energy storage system. To qualify you must reside in an area with two or more utility PSPS events or live in a High Fire Threat District.

To see if you reside in one of these areas [click here](#).

To apply for SGIP:

- Reach out to an installer who can help navigate the application process. [Click here](#) for a list of installers by county.
 - <http://gsfahome.org/programs/arp/overview.shtml>.
- Your chosen installer will work directly with the utility company on your application.
 - Eligibility is determined by the SGIP program administrators.
- After approval, your vendor will install your energy storage system.

For more information on the Self-Generation Incentive Program [visit](#).

7. Can I get a loan for a generator or backup batteries?

What is the Freedom Loans Program?

The FreedomTech Financial Loan Program provides Californians with affordable financial loans to purchase needed assistive technology. The financial loans range from \$500 to \$15,000. The terms of the loan are up to 5 years, rate is 6% fixed, and there is a 1% origination fee (of the requested amount of the loan).

Eligibility requirements:

- Be a California resident.
- Must be at least 18 years or older to apply.
- Identify as an individual with a disability or an individual borrowing on behalf of an individual with a disability.
- Demonstrate a stable employment or income history.
- Good payment history in the past year.
- Assistive Technology must be eligible for financing.

To learn more about the FreedomTech Financial Loan Program [visit here](#).

8. Will Medi-Cal or Medicare cover generators or backup batteries?

For most persons, their concern during a power shutoff event is that their medical equipment needs reliable and continuous access to power supply. Unfortunately, it is unlikely that Medicare or Medi-Cal will cover the cost of a generator or backup power supply. The Center for Medicare and Medicaid Services does not consider a generator as medical equipment even though persons use it to power medical equipment. As a result, Medicare and Medicaid do not cover associated costs.^{xiv}

A. Will a Medi-Cal waiver cover generators or backup batteries?

The purpose of Medi-Cal waivers is to provide in-home and community-based care for people who would otherwise have to go into long-term institutional care.^{xv} HCBS waivers are Section 1915 (c) waivers. The waiver allows individuals to stay in their home or community setting instead of going into a nursing facility. The Home and Community Based Alternatives (HCBA) waiver includes a variety of different services,

including environmental accessibility adaptations, which are modifications that persons can use to modify their home.^{xvi}

The HCBA waiver covers environmental accessibility adaptations when they are necessary to ensure a participant's health, welfare and safety, or enable a participant to function with greater independence in the home, and without which, an individual would require institutionalization. Environmental accessibility adaptations can include installing specialized electric systems that are necessary to accommodate medical equipment necessary for safety and welfare.^{xvii}

Under the waiver, environmental accessibility adaptations can include installing specialized electric systems when necessary to accommodate medical equipment necessary for your safety and welfare. Back-up energy may qualify as a specialized electric system. A waiver agency can help determine whether a generator or other back-up power options are medically necessary. Waiver agencies contract with the state to provide case management, purchase waiver services, enroll participants, and perform "level of care" evaluations, and determine a Plan of Treatment.

Submitting a waiver application for environmental accessibility adaptations has a series of requirements, including:

- your current physician's order specifying the requested equipment or service,
- a report to evaluate the medical necessity of the requested equipment or service,
- an evaluation of the equipment and how/why it is necessary for you, and
- a list of your current equipment and a description of any inadequacies.

The waiver agency will assist you in gathering all the correct documentation.

One limitation of the Home and Community Based Alternatives Waiver is a \$5,000 lifetime limit on environmental accessibility adaptations.^{xviii} Generally, whole-house generators can cost anywhere from \$3,000 to

\$15,000. Many whole house generator models may exceed the \$5,000 lifetime limit, although you can likely find a model under the limit.

To find the Waiver agency that serves your zip-code, [click here](#).

9. Complaints

Disability Rights California would like to hear your experiences, complaints, and concerns with power shutoff events. You can contact DRC at **1-800-776-5746**.

Utility companies have customer service departments who may be able to resolve your complaints or refer you to additional resources. You can find the contact information for each utility's customer service department below:

PG&E

Residential Customer Service Center phone number: **1-877-660-6789**
Monday-Friday, 7 a.m. - 9 p.m.
Saturday, 8 a.m. - 6 p.m.

SCE

Customer Support phone number: **1-800-655-4555**
Monday-Friday, 7 a.m. - 7 p.m.
Saturday, 8 a.m. - 5 p.m.

SDG&E

Customer Service Center phone number: **1-800-411-7343**
Monday-Friday, 7 a.m. - 8 p.m.
Saturday, 7 a.m. - 6 p.m.

Bear Valley

Customer Service Team phone number: **1-800-808-2837**
Monday-Friday, 8 a.m. - 5 p.m.

Liberty

Customer Care Center phone number: **1-800-782-2506**

Monday-Friday, 8 a.m. - 5 p.m.

Email: CustomerInfo@libertyutilities.com

Pacific Corp

Customer service phone number: **1-888-221-7070**

CPUC

The California Public Utilities Commission (CPUC) regulates California utility providers. The CPUC has a consumer affairs branch where complaints can be submitted. You can file a complaint with the CPUC [here](#).

DFEH

You can file a complaint with the Department of Fair Employment and Housing (DFEH) if you believe you've been discriminated against because of your disability. You can file a complaint with DFEH [here](#).

10. COVID-19 Financial Relief Programs

Electric utilities are required to provide financial relief to qualifying customers due to the COVID-19 pandemic. This includes suspending some customer disconnections for non-payments. You can find more information about these protections [here](#) and the programs for various utility companies below:

For PG&E, click [here](#).

For SCE, click [here](#).

For SDG&E, click [here](#).

11. Additional Resources

[Click here](#) for DRC's Wildfire Resource Guide.

[Click here](#) for DRC's Power Shutoff Resource Guide.

[Click here](#) for the California Health & Human Services Agency's (CHHSA) Resource Guide.

[Click here](#) for the CHHSA's Personal Emergency Plan.

If you have an emergency or are in trouble, call 911. Disability Rights California cannot help you evacuate or stay safe.

We can talk to you about your questions, determine how we can help, and get you the information that you need.

For assistance, please contact the Disability Rights California confidential intake line at 1-800-776-5746 or TTY call: 1-800-719-5798 available 9:00 am - 4:00 pm, Monday through Friday.

<https://www.fda.gov/media/80782/download>

<https://adata.org/factsheet/emergency-power>

https://prepareforpowerdown.com/wp-content/uploads/2019/10/Emergency-Power-Planning-Factsheet_revised-10-2019.pdf

ⁱ <https://www.cpuc.ca.gov/psps/>.

ⁱⁱ *Id.*

ⁱⁱⁱ

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV§ionNum=8593.3.

^{iv} <https://www.cpuc.ca.gov/general.aspx?id=6442466695>.

^v

https://www.sccgov.org/sites/dpd/DocsForms/Documents/Fire_Hazard_Zone_Fact_Sheet.pdf.

^{vi} <https://www.cpuc.ca.gov/General.aspx?id=12186>.

^{vii} <https://www.cpuc.ca.gov/medicalbaseline/>.

^{viii} <https://www.listocalifornia.org/get-prepared/>.

^{ix}

https://www.pge.com/tariffs/assets/pdf/tariffbook/ELEC_MAPS_Service%20Area%20Map.pdf.

^x <https://disabilitydisasteraccess.org/power-safety-shutoff-resources-application/>.

^{xi} Pacific Gas and Electric Company's 2021 Access and Functional Needs Plan for Public Safety Power Shutoff Support at 12.
<https://docs.cpuc.ca.gov/publisheddocs/efile/g000/m365/k301/365301740.pdf>.

^{xii} <https://www.sce.com/about-us/who-we-are/leadership/our-service-territory>.

^{xiii} <https://disabilitydisasteraccess.org/about-us/>.

^{xiv} https://www.cms.gov/about-cms/agency-information/emergency/downloads/consolidated_Medicare_FFS_Emergency_qsas.pdf.

^{xv} Application for a § 1915(c) Home and Community-Based Services Waiver, January 2020,
<https://www.dhcs.ca.gov/services/ltc/Documents/HCBA-Waiver-Amendment-12-16-19.pdf> at 166.

^{xvi} *Id* at 166.

^{xvii} *Id* at 166.

^{xviii} *Id* at 167.