

Tuesday, March 16<sup>th</sup>

## Announcements

- There was a systems glitch and all providers receiving Pfizer vaccine this week have or will be receiving a dry ice recharge shipment from McKesson. CDPH is working on a fix and will be sending out a communication.
- LA DPH has not received our allocation numbers for this week, stay tuned.
- LA has achieved a 94.2% burn rate, meaning they're getting vaccines in arms not holding them.

## Questions

- Q: For those who are living in a car, on a couch, on the street and are not in a shelter (or going to be), do providers use the attestation form anyway as it states they "may" transition into a shelter? Or should they be asking where the individual slept the previous night? Or should this be based on provider's discretion?
  - A: LA DPH expects eligibility accommodations to be at the provider's discretion.
- Q: How do we process attestations?
  - A: To verify eligibility, you want to be able to verify documentation was taken and can document attestation form was used for verification in EHR.
  - Comment: One clinic expressed they keep their own log of verifying eligibility. They keep the attestation forms, and might scan them to keep electronically. Other clinics expressed they don't have the capacity to keep thousands of pieces of paper and scan them. Another clinic isn't keeping any hard copies of the forms, but they're keeping staff accountable of verifying eligibility.
  - Please note, no clinics are expected to keep and scan the forms.
  - The purpose of attestation forms is to have people vouch or show eligibility, they are not for documentation purposes.
- Q: Are we expecting that we will be able to get reimbursed for non-clinicians giving vaccine? We currently have MAs giving vaccine, and therefore we are not eligible for administration reimbursement. Wonder if we should move to provider giving vaccine if this is not expected to happen soon? Also, are we able to get reimbursed for RN giving vaccine? or is in just billable providers.
  - Follow-up is needed to answer this question. See below for additional billing guidance as of this writing.
- Q: Can we have MAs give vaccines?
  - A: Yes, MAs are usually under physicians so if there's a nurse or physician's oversight it's okay. The physician has to look at the drawn up vial, confirm the dose and contents are correct, then instruct the MA to administer the vaccine. Not sure if they're billable.
  - Licensees Authorized to Administer Vaccines in California: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/Immunization/Authorized-Licensees.aspx>

## Additional Billing Guidance

### ***Reimbursement Not Yet Approved for Non-Billable Providers***

In mid-February, we learned that DHCS cannot currently reimburse FQHCs for vaccine administration by non-billable providers and cannot reimburse billable providers outside the PPS system. DHCS is seeking CMS approval that will allow medical professionals (including both billable and non-billable) with adequate training to administer vaccine outside of a traditional PPS visit (see [SPA 20-0040](#)). Once DHCS

secures federal approvals, they will provide additional guidance on how the clinics should bill for the administration of the COVID-19 vaccine.

In the meantime:

- Keep billing for privately insured patients and Medicare patients. DHCS policy does not apply to these payers.
- Bill PPS for Medi-Cal patients if the vaccine administration is part of a PPS billable visit.
- Hold your Medi-Cal claims for vaccine administration that is not part of a billable visit. We are awaiting guidance from DHCS on retroactivity.

***COVID 19 PE Coverage for Vaccine: Currently Only for Individuals with Positive Test***

In mid/late February, issues arose related to using the COVID 19 PE/Uninsured Group to provide coverage for the COVID vaccine for uninsured individuals, in addition to the testing and treatment services it already covers. Unfortunately, in the language DHCS originally submitted to CMS the program is structured so that only COVID positive individuals can receive and be covered for subsequent treatments. Since the vaccine is considered a treatment, only vaccines for those who got tested and had positive result will be reimbursed. CPCA and patient advocate groups are working with DHCS to solve this issue. Until then, COVID-19 PE only covers the COVID vaccine for people who test positive.

***Update on administration fee that we anticipate DHCS will match for Medi-Cal***

Medicare Payment: On March 15, 2021, CMS is updating the Medicare payment rates for COVID-19 vaccine administration. Effective for services furnished on or after March 15, 2021, the new Medicare payment rate for administering a COVID-19 vaccine will be approximately \$40 to administer each dose of a COVID-19 vaccine. This means that starting on March 15, 2021, for single dose COVID-19 vaccines, Medicare will pay approximately \$40 for its administration. Starting on March 15, 2021, for COVID-19 vaccines requiring multiple doses, Medicare will pay approximately \$40 for each dose in the series. This rate reflects updated information about the costs involved in administering the COVID-19 vaccine for different types of providers and suppliers, and the additional resources necessary to ensure the vaccine is administered safely and appropriately. The rate will be geographically adjusted based on where the service is furnished.