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DATE: December 23, 2016

ALL PLAN LETTER 16-009 (*REVISED*)

TO: ALL MEDI-CAL MANAGED CARE HEALTH PLANS

SUBJECT: ADULT IMMUNIZATIONS AS A PHARMACY BENEFIT

PURPOSE:

The Medi-Cal fee-for-service (FFS) contract drug list (CDL) has been amended to include specified adult immunizations as a pharmacy benefit. The purpose of this All Plan Letter (APL) is to clarify for Medi-Cal managed care health plans (MCPs) that they must also provide these adult immunizations on their formulary. This APL also clarifies the professional requirements pharmacists must follow when they administer these immunizations. *Revised text is found in italics and deleted text is in strikeout.*

BACKGROUND:

Effective February 1, 2016, several adult immunizations were added to the FFS CDL as a pharmacy benefit to expand access to immunizations for individuals who are not eligible for the Vaccines for Children (VFC) program, i.e. Medi-Cal beneficiaries 19 years of age and older.¹ This benefit coverage is restricted to immunizations administered in accordance with the current routine immunization schedules published by the Advisory Committee on Immunization Practices (ACIP) of the Centers for Disease Control and Prevention (CDC). All adult immunizations available on the CDL are found in the Pharmacy section of the Medi-Cal Provider Manual² or by searching the Medi-Cal Formulary File.³

Pursuant to Section 4052(a)(11) of the California Business and Professions (B & P) Code⁴, a pharmacist may administer any immunization pursuant to a protocol with a prescriber. Additionally, pursuant to Section 4052.8 of the B & P Code (effective

¹ The Medi-Cal Update Bulletin 864 is available at:

<http://files.medi-cal.ca.gov/pubsdoco/bulletins/artfull/ph201601r.asp>

² The Pharmacy section of the Medi-Cal Provider Manual is available at:

http://files.medi-cal.ca.gov/pubsdoco/manuals_menu.asp (see “Pharmacy: Contract Drugs List”)

³ The Medi-Cal Formulary File is available at: <http://www.dhcs.ca.gov/services/Pages/FormularyFile.aspx>

⁴ Business and Professions Code, Division 2, Chapter 9, Article 3, Section 4052(a)(11).

January 1, 2014),⁵ pharmacists may independently initiate and administer vaccines on ACIP-recommended routine immunization schedules published by the CDC to individuals 3 years of age and older. A pharmacist administering immunizations may also initiate and administer epinephrine or diphenhydramine by injection for the treatment of a severe allergic reaction.

In order to provide immunization services, the pharmacist must fulfill the following requirements:

- Complete an immunization training program endorsed by the CDC or the Accreditation Council for Pharmacy Education that includes hands-on injection technique, clinical evaluation of indications and contraindications of vaccines, and the recognition and treatment of emergency reactions to vaccines, and shall maintain that training.
- Be certified in basic life support.
- Comply with all state and federal recordkeeping and reporting requirements, including providing documentation to the patient's primary care provider and entering information in the appropriate immunization registry designated by the Immunization Branch of the State Department of Public Health.

For administration of immunizations to children less than 3 years, a written physician protocol is required.

POLICY:

MCPs are required to have the ACIP-recommended adult immunizations on the FFS CDL (see Attachment A) as part of their pharmacy formulary benefit, and should ensure formulary comparability for these immunizations. These ACIP-recommended adult immunizations are considered preventive services per the United States Preventive Services Task Force (USPSTF) and the ACIP.⁶ Per DHCS contracts, MCPs cannot impose prior authorization on preventive services and that includes immunizations given as a preventive service to a particular age group.⁷ With the administration of certain immunizations that are subject to further clinical criteria, treatment authorization

⁵ Business and Professions Code, Division 2, Chapter 9, Article 3, Section 4052.8.

⁶ The Center for Consumer Information & Insurance Oversight, Affordable Care Act Implementation FAQs - Set 12, "Coverage of Preventive Services." https://www.cms.gov/CCIIO/Resources/Fact-Sheets-and-FAQs/aca_implementation_faqs12.html. Accessed May 10, 2016.

⁷ Two Plan Boilerplate Managed Care Contract, Exhibit A, Attachment 5 (UTILIZATION MANAGEMENT), Section 2.G. (Pre-Authorizations and Review Procedures).

guidelines should adhere to the least restrictive ACIP or Medi-Cal Provider Manual recommendations available.⁸

Immunizations can be reimbursed as a pharmacy benefit when administered with an appropriate medical indication by an appropriately licensed provider acting within their scope of practice. MCPs are reminded that per contract, they “shall ensure that member-specific immunization information is periodically reported to an immunization registry(ies) established in the Contractor’s Service Area(s) as part of the Statewide Immunization Information System. Reports [to the immunization registry] shall be made following the member’s initial health assessment and all other health care visits which result in an immunization being provided”.⁹ If the immunization provider is a pharmacist, then MCPs should ensure they meet the requirements as outlined in Section 4052.8 described above. The Provider Manual has been updated with the CDL changes noted in this All Plan Letter.

If you have any questions regarding this All Plan Letter, please contact your Managed Care Operations Division contract manager.

Sincerely,

Original signed by Sarah Brooks

Sarah Brooks
Deputy Director
Health Care Delivery Systems

⁸ Advisory Committee on Immunization Practices Recommended Immunization Schedule for Adults Aged 19 Years or Older — United States, 2016: <http://www.cdc.gov/vaccines/schedules/hcp/adult.html>, accessed June 16, 2016.

⁹ Two Plan Boilerplate Managed Care Contract, Exhibit A, Attachment 11 (CASE MANAGEMENT AND COORDINATION OF CARE), Section 19 (Immunization Registry Reporting).