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DATE: January 31, 2018

ALL PLAN LETTER 18-004
SUPERSEDES POLICY LETTER 96-013 AND ALL PLAN LETTER 07-015

TO: ALL MEDI-CAL MANAGED CARE HEALTH PLANS

SUBJECT: IMMUNIZATION REQUIREMENTS

PURPOSE:

The purpose of this All Plan Letter (APL) is to clarify requirements related to the provision of immunization services. This APL supersedes Policy Letter (PL) 96-013 and APL 07-015.

BACKGROUND:

Medi-Cal managed care health plans (MCPs) are contractually required to cover a wide range of preventive services and screenings in accordance with United States Preventive Services Task Force (USPSTF) grade “A” or “B” recommendations, as well as American Academy of Pediatrics/Bright Futures for members under the age of 21. USPSTF views immunizations as preventive services and recommends that all immunizations be provided as recommended by the Advisory Committee on Immunization Practices (ACIP).¹ Exhibit A, Attachment 5, Utilization Management, Pre-Authorization and Review Procedures² in the MCP contract states that prior authorization requirements are not to be applied to certain services, including preventive services. This is consistent with Medi-Cal Fee for Service (FFS) requirements.³

MCP contracts require the timely provision of recommended immunizations for both children and adults enrolled in the MCP. MCPs must provide childhood immunizations in accordance with the most recent childhood immunization schedule and recommendations published by ACIP⁴ for the Centers for Disease Control and Prevention (CDC). APL 16-009⁵ clarifies that the MCPs’ coverage obligation to provide

¹ The USPSTF Task Force’s Immunization Recommendations can be found at:
<https://www.uspreventiveservicestaskforce.org/BrowseRec/Search?s=immunization>.

² Medi-Cal Managed Care Boilerplate Contracts can be found at:
<http://www.dhcs.ca.gov/provgovpart/Pages/MMCDBoilerplateContracts.aspx>.

³ State Plan Amendment 13-014 can be found at:
<http://www.dhcs.ca.gov/formsandpubs/laws/Pages/13-014.aspx>.

⁴ ACIP recommended Immunization Schedules can be found on the CDC’s website at:
<https://www.cdc.gov/vaccines/schedules/hcp/index.html>.

⁵ APL 16-009 can be found at:
<http://www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/APL2016/APL16-009R.pdf>.

adult immunizations is based on the ACIP-recommended immunizations included on the Medi-Cal FFS contract drug list as a pharmacy benefit.⁶

MCP contracts also include requirements that allow all members to access local health departments (LHDs) for immunizations and for MCPs to reimburse LHDs for the administration fee for immunizations administered to members, excluding immunizations for which the member is already up to date.

POLICY:

MCPs must ensure timely provision of immunizations to members in accordance with the most recent schedule and recommendations published by ACIP, regardless of a member's age, sex, or medical condition, including pregnancy.

MCPs must require their network providers to document each member's need for ACIP-recommended immunizations as part of all regular health visits, including, but not limited to the following types of encounters:

- Illness, care management, or follow-up appointments
- Initial Health Assessments (IHAs)
- Pharmacy services
- Prenatal and postpartum care
- Pre-travel visits
- Sports, school, or work physicals
- Visits to a LHD
- Well patient checkups

As ACIP-recommended immunizations are viewed as preventive services, these services must not be subject to prior authorization. In instances where the Medi-Cal Provider Manual outlines immunization criteria that is less restrictive than ACIP criteria, MCPs must provide the immunization in accordance with the less restrictive Medi-Cal Provider Manual criteria.⁷

Title 16, California Code of Regulations (CCR), Section 1746.4(e) requires pharmacists to report the administration of any vaccine, within 14 days, to the appropriate immunization registry designated by the immunization branch of the State Department

⁶ The Medi-Cal list of contract drugs can be found at:

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

⁷ Medi-Cal Provider Manuals can be found at: http://files.medi-cal.ca.gov/pubsdoco/manuals_menu.asp.

of Public Health.⁸ MCP contracts require that MCPs ensure that member-specific immunization information is periodically reported to an immunization registry(ies) established in the MCPs' service areas as part of the Statewide Immunization Information System. Reports must be made following a member's IHA and after all other health care visits that result in an immunization, in accordance with state and federal laws. DHCS strongly recommends that not only pharmacists, but all MCP network providers, report immunization information within 14 days of administering an immunization.

MCPs are responsible for ensuring that their delegated entities and subcontractors comply with all applicable state and federal laws and regulations, contractual requirements, and other requirements set forth in DHCS guidance, including APLs, PLs and Dual Plan Letters. MCPs must timely communicate these requirements to all delegated entities and subcontractors to ensure timely compliance.

If you have any questions regarding the requirements of this APL, please contact your Medi-Cal Operations Division contract manager.

Sincerely,

Original signed by Nathan Nau

Nathan Nau, Chief
Managed Care Quality and Monitoring Division

⁸ Title 16 CCR, Section 1746.4 (e) can be found at:
[https://govt.westlaw.com/calregs/Document/I0EF38BB6B4F34546910A96146A8FB786?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Document/I0EF38BB6B4F34546910A96146A8FB786?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)).