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Department of Health Care Services



GAVIN NEWSOM
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DATE: December 28, 2020

ALL PLAN LETTER 20-022

TO: ALL MEDI-CAL MANAGED CARE HEALTH PLANS

SUBJECT: COVID-19 VACCINE ADMINISTRATION

PURPOSE: The purpose of this All Plan Letter (APL) is to provide Medi-Cal managed care health plans (MCPs) with information and guidance regarding COVID-19 vaccine coverage and administration in the Medi-Cal program.

BACKGROUND:

With the recent federal approval of COVID-19 vaccines, the Department of Health Care Services (DHCS) is seeking federal approval to help support delivery of the vaccines to all Medi-Cal beneficiaries. The vaccines will be provided at no cost to all beneficiaries.

DHCS will be following California's COVID-19 vaccination plan, which was approved by the California Department of Public Health (CDPH). This vaccination plan calls for implementation in several phases: pre-vaccine; limited doses available; larger number of doses available; and sufficient supply of doses available for the entire population.¹

California is leveraging its existing immunization framework and emergency response infrastructure to coordinate efforts between state, local, and territorial authorities to administer the vaccines. Throughout this effort, DHCS will be sharing appropriate information with providers, MCP partners, other key stakeholders, and Medi-Cal beneficiaries.

Consistent with the approach being taken by Medicare through Medicare Advantage Plans, DHCS will carve out the COVID-19 vaccines and associated administration fees from the Medi-Cal managed care delivery system and will reimburse providers under Medi-Cal fee-for-service (FFS) for medical, pharmacy, and outpatient claims. This approach will ease program administration, eliminate challenges with out-of-network provider reimbursements, and keep vaccine administration fee rates consistent for providers regardless of delivery system.

¹ For further information on the state's vaccination planning efforts please visit:
<https://covid19.ca.gov/vaccines/>

As the federal government will pay for the initial vaccines, there will be no Medi-Cal provider reimbursement for the COVID-19 vaccines themselves. However, providers will be able to bill Medi-Cal FFS for the COVID-19 vaccine administration fees.

DHCS is seeking federal approval to pay pharmacy claims at the Medicare administration rate, which is different than Medi-Cal's current pharmacy administration fee. Subject to federal approval, Medi-Cal will reimburse the associated COVID-19 vaccine administration fees at the allowable Medicare rate for all claims (medical, pharmacy and outpatient) based on the number of required doses, regardless of vaccine manufacturer.

DHCS is also seeking federal approvals to pay Federally Qualified Health Centers, Rural Health Centers, and Tribal 638 clinics for the vaccine administration fees outside of their current Prospective Payment System or All Inclusive Rate.

DHCS continues to closely monitor and respond to COVID-19, and is providing information, including Medi-Cal Newsflashes, on the COVID-19 Medi-Cal response webpage to all providers as a reminder of recommended safety procedures and protocols from the Centers for Disease Control and Prevention (CDC) and CDPH to help prevent spread of COVID-19. DHCS will be issuing initial and future policy guidance on COVID-19 vaccine administration and reimbursement, as necessary. Policy and reimbursement guidance will also be updated, as necessary, upon receipt of additional guidance from the Centers of Medicare & Medicaid Services and/or approvals of requested federal waivers. MCPs and providers are encouraged to continually check this COVID-19 Medi-Cal response webpage for information and regular updates to the Medi-Cal response to COVID-19.²

DHCS will also be providing call center scripts for DHCS operated call centers, the Medi-Nurse Advice Line and MCP and county partners so all are providing consistent messaging regarding the COVID-19 vaccine roll-out in Medi-Cal.

Additional Information

Pharmacies, retail clinics, providers, and any other sites of care must sign an agreement with the U.S. government to receive free supplies of the COVID-19 vaccines.

Under the agreement, all providers must vaccinate individuals regardless of existing health coverage or the type of coverage. Providers are prohibited from balance billing or otherwise charging vaccine recipients.

² The COVID-19 Medi-Cal Response webpage can be accessed at the following link:
https://files.medi-cal.ca.gov/pubsdoco/COVID19_response.aspx

Enrollment in California's COVID-19 Vaccination Program will occur in phases and local health departments (LHD) will invite providers to enroll based on CDPH Allocation Guideline phases and vaccine availability. Enrollment is limited at this time to providers who are authorized by their LHDs. Others may enroll later in January 2021, as vaccine supplies increase. Before enrolling, providers must obtain an immunization information system (IIS) ID.³ Once providers have been invited by their LHDs and have an IIS ID, they should ensure that they meet all program requirements prior to enrollment.⁴ Providers with questions about enrolling in the California COVID-19 Vaccination Program can email COVIDCallCenter@cdph.ca.gov or call (833) 502-1245, Monday through Friday, from 9 a.m. to 5 p.m.

Vaccine recipients must be provided with emergency use authorization fact sheets about the vaccines and vaccination cards identifying the brand of vaccine administered and the date of their second vaccination (if applicable).

Providers must administer the vaccines in accordance with the CDC and Advisory Committee on Immunization Practices requirements, and they must meet storage and recordkeeping requirements, including recording the administration of the vaccines to patients in their own systems within 24 hours and to public health data systems within 72 hours.

Providers will be expected to bill Medi-Cal FFS for COVID-19 vaccine administration using the claim forms and electronic media used today, unless otherwise noted. Billing specifics for the different provider communities and program areas will be released in Medi-Cal Newsflashes. Providers are encouraged to continually check the COVID-19 Medi-Cal response webpage for information and regular updates to the Medi-Cal response to COVID-19.

POLICY:

Although both the COVID-19 vaccines and associated administration fees will be carved out of the Medi-Cal managed care delivery system to Medi-Cal FFS, MCPs are reminded that they remain contractually responsible for providing case management and care coordination for their members regardless of whether or not they are financially responsible for the payment of services.

MCPs are encouraged to identify opportunities to use their existing communication pathways to support dissemination of CDPH COVID-19 public health education materials and provider education resources. MCPs should utilize their existing data

³ The California Immunization Registry is available at: <http://cairweb.org/join-cair/>

⁴ Action steps and instructions for providers can be found at: <https://eziz.org/assets/other/IMM-1295.pdf>

sources to help identify members who qualify to receive the COVID-19 vaccine in accordance with CDPH guidelines, and attempt outreach to qualifying members and their providers to encourage receipt of the COVID-19 vaccines. MCPs are responsible for coordinating medically necessary care. Care coordination may involve but is not limited to, assisting members with accessing COVID-19 vaccine administration locations, including providing non-emergency medical transportation and non-medical transportation as needed, and helping members receive the required number of doses for the COVID-19 vaccines in a timely fashion.

As mentioned above, DHCS will be issuing guidance on COVID-19 vaccine administration and reimbursement policies and will be providing call center scripts for MCP use, on a rolling basis. MCPs must ensure they convey relevant and current information on the COVID-19 vaccines to members, including the use of any customer call center scripts or other communications authorized for use by DHCS. MCPs should encourage providers to communicate with members about vaccination availability as such information is made available.

MCPs must also ensure that their Network Providers are following guidance issued by DHCS related to the administration of the COVID-19 vaccines. MCPs are encouraged to disseminate information about the administration of the COVID-19 vaccines to their Network Providers and provide any available resources and information as it becomes available from the CDC, DHCS, CDPH, and other state departments. MCPs are encouraged to continually check the COVID-19 Medi-Cal response webpage for information and regular updates to the Medi-Cal response to COVID-19.

MCPs are responsible for ensuring that their Subcontractors and Network Providers comply with all applicable state and federal laws and regulations, contract requirements, and other DHCS guidance, including APLs and Policy Letters.⁵ These requirements must be communicated by each MCP to all Subcontractors and Network Providers.

⁵ For more information on Network Providers and Subcontractors, including the definition and requirements applicable see APL 19-001, and any subsequent APLs on this topic. APLs are available at: <https://www.dhcs.ca.gov/formsandpubs/Pages/AllPlanLetters.aspx>

ALL PLAN LETTER 20-022
Page 5

If you have any questions regarding this APL, please contact your Managed Care Operations Division Contract Manager.

Sincerely,

Original Signed by Nathan Nau

Nathan Nau, Chief
Managed Care Quality and Monitoring Division