

COVID-19 Vaccine Billing and Reimbursement

NCPA has prepared this information for pharmacies claiming reimbursement for administering COVID-19 vaccine during the public health emergency. The document will be updated when new or additional information is available. The footer of the document posted at www.ncpa.org will show the date of the most recent revisions.

Pharmacist readiness

Pharmacists are <u>authorized</u> to *order and administer* COVID-19 vaccine. Pharmacists may need a Type 1 NPI number to submit on claims where they are ordering/prescribing the vaccine. You can apply for, or lookup, an NPI number at: https://npiregistry.cms.hhs.gov/. Pharmacists should also be certain they meet requirements from the board of pharmacy for a pharmacy-based immunization program.

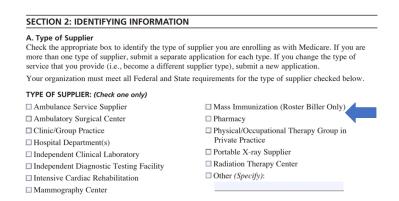
Qualified pharmacy technicians and state-authorized pharmacy interns are <u>authorized</u> to *administer* COVID-19 vaccine. Check with your board of pharmacy to determine if pharmacy technicians and interns can support your pharmacy-based immunization program. During the COVID-19 public health emergency, this authorization also extends to COVID-19 testing and childhood vaccines.

Pharmacy readiness

Typically, pharmacies are the entity that submits claims for immunization services provided by a pharmacist and most already have a Type 2 NPI number.

Payers

 Medicare – COVID-19 vaccine will be covered under the Part B benefit. Pharmacies can enroll in Medicare as a *Pharmacy* or as a *Mass Immunizer* online via the Provider Enrollment, Chain, and Ownership System (PECOS) website or using the CMS-855b form (see Section 2 below). Enrollment fees are waived during the COVID-19 Public Health Emergency.



Pharmacies that are already enrolled in Medicare as a *DMEPOS Supplier* or *Independent Clinical Laboratory*, need to enroll as a *Pharmacy* or *Mass Immunizer* to obtain a new Provider Transaction Access Number (PTAN) for vaccine claims. Both supplier types, *Pharmacy* and *Mass Immunizer*, are able to submit claims for administering COVID-19 vaccine.

Medicare <u>payment rates</u> for COVID-19 vaccine administration will be \$28.39 to administer single-dose vaccines. For a COVID-19 vaccine requiring a series of 2 or more doses, the initial dose(s) administration payment rate will be \$16.94, and \$28.39 for the administration of the final dose in the series.

- 2. Medicaid State Medicaid programs have significant discretion in determining vaccine administration reimbursement rates but all must provide <u>coverage</u> for vaccine administration except to those with narrow range of benefit that does not ordinarily include vaccine coverage. States may elect to include vaccine administration coverage in their managed care plan contracts. Pharmacies should become familiar with vaccine administration coverage details for each state Medicaid program their patients have.
- 3. Commercial Health plans are required to reimburse in-network and out-of-network vaccine providers for administering the COVID-19 vaccine. Health plans may cover this service on the medical benefit, the prescription drug benefit, or both. Pharmacies should consider workflow, transaction fees, reimbursement rates and timing of remittance when given the option of medical billing or PBM billing.
- 4. **Uninsured** The COVID-19 vaccine administration, as well as conducting COVID-19 testing, will be covered for the uninsured through the <u>CARES Act (P.L. 116-136)</u>. The U.S. Department of Health and Human Services (HHS) will provide reimbursement for these services generally at Medicare rates, subject to available funding through the CARES Act. Pharmacies must enroll as a provider participant, check patient eligibility, submit patient information, and submit the claim in order to receive payment via direct deposit. Enrollment takes a couple weeks.
 - a. **Updated** The HRSA Uninsured <u>Program</u> functions like a medical benefit and must be billed via the medical benefit pathway to Optum Pay. Claims billed to OptumRx (the PBM) will be rejected.
 - b. HRSA has contracted with UnitedHealth Group to be the sole administrator of the Uninsured Program for COVID-19. You will need a direct deposit/ACH account with Optum Pay. You can sign in with your Optum ID, or if you do not have an Optum account, you can create an Optum ID.
 - c. Once you have an Optum ID, you will need to validate the facility's <u>Taxpayer Identification</u> <u>Number (TIN)</u>, set up <u>Optum Pay Automated Clearing House (ACH)</u> (video walk through <u>here</u>), add <u>Provider roster</u> (video walkthrough <u>here</u>), add and <u>attest to patient</u> (video walkthrough here), and <u>submit claims</u> for reimbursement.
 - d. When submitting claims, you will need the Payer ID (95964), Payer name (COVID19 HRSA Uninsured Testing and Treatment Fund), and temporary member ID for each patient (found in the program portal after submitting patient roster).

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When billing claims to the HRSA uninsured program, it is essential for pharmacies to attest to the following:

- a. You have checked for health care coverage eligibility and confirm that the patient is uninsured, verifying no other payer will reimburse you for the COVID-19 vaccine administration (i.e. no coverage through an individual or employer-sponsored plan, federal healthcare program or Federal Employees Health Benefits Program)
- b. You accept the defined reimbursement as payment in full
- c. You agree not to balance bill the patient
- d. You agree to terms and conditions (with the potential of post-reimbursement audit review)

Billing codes

1. **Medical billing pathway** – Pharmacies using the medical pathway will need to use a medical billing intermediary (e.g. OmniSys, FDS, EBS, Change Healthcare).

The medical billing pathway is likely to rely on <u>CPT codes</u>; a vaccine product code in combination with sequential administration codes. As of 1/21/21, codes are only available for the Pfizer, Moderna, AstraZeneca*, and Janssen* products, as listed below. Talk to your medical billing intermediary about submitting claims for Medicare Part B and health plan medical benefits.

- a. Pfizer product: 91300, first dose: 0001A, second dose: 0002A
- b. Moderna product: 91301, first dose: 0011A, second dose: 0012A
- c. AstraZeneca* product: 91302, first dose: 0021A, second dose: 0022A
- d. Janssen* product 91303, single dose: 0031A
- 2. **Prescription billing pathway** Pharmacies using the prescription pathway use the dispensing system to submit a claim to a PBM. This <u>guidance</u> from NCPDP is not a mandate for PBMs, but many may implement the recommendations as published.

Key highlights (which MAY VARY by PBM) are:

- a. use the actual liquid volume (e.g. 0.5 mL) for the Quantity Dispensed
- b. a Days Supply of "1"
- c. Professional Service Code "MA"
- d. Ingredient Cost of \$0.00 or \$0.01 (depending on the payer)
- e. submission clarification codes to indicate which dose for two-dose vaccines (e.g. initial dose = SCC 2 and second dose = SCC 6).

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^{*}Vaccine does not have Emergency Use Authorization as of 1/21/21