Medi-Cal Reimbursement of Vaccines For Children (VFC)-Enrolled Pharmacy Providers and for VFC and Non-VFC Vaccines – Frequently Asked Questions (FAQs) Version 1.0

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Background

The Department of Health Care Services (DHCS) will reimburse Medi-Cal enrolled pharmacy providers who provide immunization services under the Vaccines For Children (VFC) program to VFC-eligible members in Medi-Cal. For medical claim information, pharmacies can contact the California Medicaid Management Information System (CA-MMIS) Fiscal Intermediary's Telephone Service Center (TSC) at 1-800-541-5555.

VFC-funded vaccine claims for the immunization administration fee can be submitted as a pharmacy claim through Medi-Cal Rx for both Medi-Cal fee-for-service and managed care plan (MCP) members; or as a medical claim to either DHCS (CA-MMIS) for fee-for-service members, or to the MCP's medical benefit for MCP members. The consultation and assessment of the need to vaccinate (vaccination initiation or prescribing), which includes history, examination, and medical decision making, must be submitted on a medical claim as Pharmacist Services to the member's applicable medical benefit. Pharmacy providers are reimbursed for the initiation and administration of vaccinations in accordance with the statutory authority of <u>Welfare and</u> <u>Institutions Code (W&I Code)</u>, Section 14132.968 (3), under Pharmacist Services when rendered to Medi-Cal members. Under this statute, reimbursement is at 85 percent of the fee schedule for Physician Services under the Medi-Cal program.

Vaccines funded by the VFC program are available free of charge to Medi-Cal members 18 years of age and younger. Pharmacy providers who are enrolled in Medi-Cal and wish to administer the vaccines to VFC-eligible Medi-Cal members must enroll in the VFC program. Detailed instructions on enrolling as a Medi-Cal Pharmacy can be found in <u>Fee-For-Service</u> <u>Enrollment for Medi-Cal Rx Pharmacies using PAVE</u>. The vaccines must be administered in accordance with the <u>ACIP Vaccine Recommendations and Guidelines</u> published on the <u>About</u> <u>the Vaccines for Children (VFC) Program</u> page on the <u>Centers for Disease Control and</u> <u>Prevention (CDC)</u> website.

The VFC program is administered by the <u>California Department of Public Health (CDPH)</u> <u>Immunization Branch</u>. CDPH makes Advisory Committee for Immunization Practices (ACIP) recommended vaccines available through the <u>VFC program</u>. CDPH maintains a list of VFC-enrolled providers, including pharmacies, and distributes VFC-funded vaccines to them for immunization to VFC-eligible children. Pharmacies interested in enrolling can email CDPH at <u>MyVFCVaccines@cdph.ca.gov</u>.

Medi-Cal will reimburse for the immunization administration fee and the vaccine initiation fee (consultation and assessment), as applicable. The ordering pharmacist must be enrolled as an Ordering, Referring, and Prescribing (ORP) provider under Medi-Cal for vaccine initiation claim reimbursement. Additional information on ORP enrollment may be found at the following links: <u>Ordering/Referring/Prescribing Only Enrollment Information</u> and <u>Ordering, Referring, Prescribing (ORP) Enrollment</u>. Since VFC vaccines are provided free of charge, pharmacy

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providers must not bill Medi-Cal for the cost of the vaccines. For non-VFC vaccines, pharmacy providers can bill Medi-Cal for the cost of the vaccine.

Medi-Cal has covered vaccines as a pharmacy benefit for members 19 years of age and older since 2017. This policy update expands vaccine coverage for members 18 years of age and younger through the VFC program and as a pharmacy benefit through Medi-Cal Rx or as a medical claim, as applicable.

Note: As a reminder, DHCS (CA-MMIS) medical claim answers can be found in the <u>DHCS</u> <u>Provider Manual</u>.

Refer to the following frequently asked questions (FAQs) and corresponding answers regarding Medi-Cal vaccine coverage as a pharmacy and medical benefit (including VFC), how to submit claims, reimbursement, etc.

Refer to the <u>Vaccines For Children (VFC) Program</u> section in the DHCS Provider Manual for more billing details for fee-for-service medical claims, including vaccine CPT codes.

Pharmacy-Administered Vaccine FAQs

1. What is the statutory authority for pharmacists to administer immunizations in California?

California law authorizes pharmacists to administer immunizations pursuant to a protocol with a prescriber (*Business and Professions Code* [Bus & Prof Code], *Section 4052*). A pharmacist may also independently initiate and administer vaccines that are authorized by the U.S. Food and Drug Administration (FDA) and listed on the routine immunization schedules, as recommended by the Advisory Committee for Immunization Practices (ACIP) and published by the Centers for Disease Control and Prevention (CDC), for persons 3 years of age and older if they meet certain requirements (such as training, basic life support certification, and recordkeeping requirements) (Bus & Prof Code, Section 4052.8 and *California Code of Regulations* [CCR], Title 16, Section 1746.4).

2. Does a pharmacy need a prescription from a prescriber to vaccinate a recipient in a pharmacy?

No, a pharmacist does not need a prescription from a prescriber (such as a physician, nurse practitioner, physician assistant, etc.) to administer an immunization regardless of a recipient's type of insurance. However, some pharmacies may have specific policies concerning prescription requirements. If prescribers write a prescription for a vaccination when referring a recipient to a pharmacy for immunizations, it may facilitate administration and reporting of the immunization to the primary care provider, as California regulation requires the pharmacist to notify the vaccine recipient's primary care provider (*Business and Professions Code* [Bus & Prof Code], Section 4052 [a][10][B]), and *California Code of Regulations* [CCR], Title 16, Section 1746.4 [d]).

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Medi-Cal Reimbursement of VFC-Enrolled Pharmacy Providers and for VFC and 4 Non-VFC Vaccines – FAQs **Note:** The pharmacy must bill the immunization administration fee using the pharmacist's National Provider Identifier (NPI) number in the Prescriber ID field (411-DB) if the immunizing pharmacist is initiating and administering the vaccine independently. If administering based on a prescription or pursuant to a protocol with a prescriber, the immunizing pharmacist must use the prescriber's NPI in the Prescriber ID field (411-DB) to bill the immunization administration fee.

3. How old must a person be to be immunized by a pharmacist in California?

By California law, the recipient must be at least 3 years of age if the pharmacist is independently initiating the vaccination (consultation and assessment) and administering the vaccine pursuant to *Business and Professions Code* (Bus & Prof Code), Section 4052.8. The recipient may be any age if the pharmacist is administering the immunizations pursuant to a protocol with a prescriber (Bus & Prof Code, Section 4052 [a][11]) or pursuant to a prescription written by a prescriber.

4. How does the primary care provider find out about their patient's immunizations administered in a pharmacy?

Pharmacists are required to report any vaccine they administer into the California Immunization Registry (CAIR) and notify the recipient's primary care or prenatal care provider (if known) within 14 days (*California Code of Regulations* [CCR], Title 16, Section 1746.4). Primary care providers can access patient information in CAIR to view immunizations administered by pharmacists and other health care providers who utilize the CAIR system. For more information, visit the <u>California Immunization Registry</u> page.

5. How can pharmacists determine which vaccines are due?

Pharmacists should review the patient's immunization records in the California Immunization Registry (CAIR), which is recommended by the American Pharmacists Association (APhA), to determine immunization scheduling and missing immunizations. The CAIR registry records the recipient's administered vaccine history and should be used instead of verbal information from the recipient or recipient's family member or guardian. Non-documented, verbal vaccine history is unreliable. Pharmacies should not depend on potentially incomplete dispensing system records or inaccurate patient-reported histories. For more information about pharmacy participation in CAIR, review the <u>California</u> <u>Immunization Registry</u> page. You can also utilize the free <u>Pharmacists' Patient Care Process</u> to <u>Immunization Services</u> toolkit to help you implement the contents of the APhA's <u>Applying the Pharmacists' Patient Care Process to Immunization Services</u>.

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Pharmacist Administered VFC at VFC-Enrolled Pharmacy Providers in Medi-Cal

6. What is the Vaccines For Children (VFC) program?

The VFC program is a federally funded program that provides vaccines at no cost to enrolled providers who serve eligible children from birth through 18 years of age.

7. What vaccines are covered under the Vaccines For Children (VFC) program?

The Advisory Committee on Immunization Practices (ACIP) determines the vaccines that are available through the VFC program. VFC covers any vaccine included in the pediatric immunization schedules. VFC providers can order most routine childhood vaccines as listed on the <u>Child and Adolescent Immunization Schedule by Age</u> page that protect against serious diseases (refer to the <u>Vaccines by Disease</u> page). New vaccines, including combination vaccines approved by the U.S. Food and Drug Administration (FDA) and recommended by <u>ACIP</u>, are also supplied to enrolled providers through the VFC program after a federal contract for the vaccine is in place.

8. Under what authority does Medi-Cal reimburse pharmacies for pharmacist administration of immunizations?

Medi-Cal reimburses pharmacies for pharmacist administration of immunizations under the authority of Pharmacist Services (*Welfare and Institutions Code* [W&I Code], <u>Section 14132.968</u>) and federal approvals for reimbursement through state plan amendments. All pharmacists who render these services must follow the protocols in accordance with the requirements of the *Business and Professions Code* (Bus & Prof Code) and *California Code of Regulations* (CCR) and other statutory authorities, including the training, provider notifications, and all record keeping as specified in the protocols and in pharmacists' scope of practice.

Refer to the <u>Vaccines For Children (VFC) Program</u> section in the <u>DHCS Provider Manual</u> for more billing details on medical claims for fee-for-service, including vaccine CPT codes.

9. What are Pharmacist Services?

Pharmacist Services include eight specific services, which are covered benefits when rendered by a pharmacist. These services must be provided in accordance with the requirements and protocols outlined in the *Business and Professions Code* (Bus & Prof Code) and *California Code of Regulations* (CCR). They are as follows:

- 1. Furnishing travel medications, as authorized in Bus & Prof Code, Section 4052(a)(10)(A)(iii) and as described in CCR, Title 16, Section 1746.5.
- 2. Furnishing naloxone hydrochloride, as authorized in Bus & Prof Code, Section 4052.01 and as described in CCR, Title 16, Section 1746.3.

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- 3. Furnishing self-administered hormonal contraception, as authorized in Bus & Prof Code, Section 4052.3(a) and as described in CCR, Title 16, Section 1746.1.
- 4. Initiating and administering immunizations, as authorized in Bus & Prof Code, Section 4052.8 and as described in CCR, Title 16, Section 1746.4.
- 5. Providing tobacco cessation counseling and furnishing nicotine replacement therapy, as authorized in Bus & Prof Code, Section 4052.9 and as described in CCR, Title 16, Section 1746.2.
- 6. Initiating and furnishing preexposure prophylaxis, as authorized in Bus & Prof Code, Section 4052.02 and as described in CCR, Title 16, Section 1747, limited as described in *Welfare and Institutions Code* (W&I Code), Section 14132.968(b)(1)(F).
- 7. Initiating and furnishing postexposure prophylaxis, as authorized in Bus & Prof Code, Section 4052.03 and as described in CCR, Title 16, Section 1747.
- 8. Providing medication therapy management in conjunction with dispensing specialty drugs as authorized in W&I Code, Section 14132.969.

Note: Pharmacist Services do not include services associated with the professional dispensing fee, as defined in W&I Code, Section 14105.

10. Who qualifies to submit a Medi-Cal claim for a pharmacist billing for immunization administration or Pharmacist Services?

A claim for payment of immunization administration by a pharmacist or a claim for Pharmacist Services may only be submitted by a Medi-Cal enrolled Pharmacy. Billing providers must be pharmacies and not pharmacists. For Vaccine For Children (VFC) vaccine administration claims, the pharmacy must be a VFC-enrolled provider and a Medi-Cal enrolled pharmacy to bill Medi-Cal for VFC vaccine fees.

A pharmacist does not qualify to enroll as a Medi-Cal billing provider. The pharmacist must be a Medi-Cal Ordering, Referring, and Prescribing (ORP) provider if the immunizing pharmacist is initiating the vaccination (consultation and assessment) and administering the vaccine independently. Refer to the *Pharmacy Administered Immunizations/Vaccines* section in the <u>Medi-Cal Rx Provider Manual</u> as well as **question #2** and **question #3**.

11. Who are Vaccines For Children (VFC) eligible children?

A child is eligible for the VFC program if they are 18 years of age and younger and are one of the following: uninsured, underinsured (immunized at a Federally Qualified Health Center or Rural Health Center), Medicaid-eligible or Medicaid-enrolled, American Indian or an Alaska Native who is 18 years of age and younger, as defined by the Centers for Disease Control and Prevention (CDC). Refer to the <u>Vaccines for Children (VFC) Program</u> <u>Eligibility</u> page for more information.

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- Does not cover vaccines; OR
- Does not cover certain vaccines; **OR**
- Covers vaccines but has a fixed dollar limit or cap for vaccines. Once that fixed dollar amount is reached, a child is then eligible.
- 12. Can a pharmacist administer a vaccine to children younger than 3 years of age pursuant to a protocol with a provider or a prescription by a provider and is it reimbursable under Medi-Cal and Vaccines For Children (VFC)?

Yes. Refer to **question #2** and **question #10** for additional details on requirements.

13. Is a Medi-Cal pharmacy enrolled in the Vaccines For Children (VFC) program reimbursed if the pharmacy technician administers the vaccine?

VFC vaccine administration fees will be reimbursed by Medi-Cal if administered in accordance with California statutes and regulations. COVID-19 and Influenza vaccines will be reimbursed if administered by a qualified pharmacy technician under direct supervision and under control of a pharmacist, pursuant to <u>Business and Professions Code (Bus & Prof</u> <u>Code)</u>, Section 4115. Refer to **question #2** for additional billing requirements.

14. How does a Medi-Cal pharmacy enroll as a Vaccines For Children (VFC) provider?

The VFC Pharmacy program is being coordinated by the California Department of Public Health (CDPH). Pharmacies interested in joining the program are encouraged to email <u>MyVFCVaccines@cdph.ca.gov</u>.

15. What requirements must a pharmacist meet to render services to Medi-Cal members?

Pursuant to *Welfare and Institutions Code* (W&I Code), Section 14132.968 (c), a pharmacist must be enrolled as an Ordering, Referring, and Prescribing (ORP) provider under the Medi-Cal program before rendering a service such as initiating the vaccination (consultation and assessment) and administering the vaccine independently, or under Pharmacist Services and submitting a claim for reimbursement. The Medi-Cal billing provider (the pharmacy) is responsible for obtaining the National Provider Identifier (NPI) of the ORP pharmacist and confirming that the ORP pharmacist is known to Medi-Cal and is in good standing. ORP applications must be submitted through the Provider Application and Validation for Enrollment (PAVE) Portal. Refer to the following links for additional information about ORP enrollment:

- Ordering/Referring/Prescribing Only Enrollment Information page
- Ordering, Referring, Prescribing (ORP) Enrollment

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16. Do individual pharmacists need to be Medi-Cal Ordering, Referring, and Prescribing (ORP) providers to bill for Pharmacist Services?

Yes. It is a federal requirement that state Medicaid agencies must require all ordering or referring physicians or other professionals providing services under the State plan or under a waiver of the plan to be enrolled as participating providers, pursuant to 42 Code of Federal Regulations (CFR), Section 455.410(b). Refer to the following links for additional information about ORP enrollment:

- Ordering/Referring/Prescribing Only Enrollment Information page
- Ordering, Referring, Prescribing (ORP) Enrollment

17. What is the enrollment process for pharmacists who wish to enroll as an Ordering, Referring, and Prescribing (ORP) provider under Medi-Cal?

Pharmacists should complete the following steps to enroll as an ORP provider under Medi-Cal:

- Confirm whether the pharmacist is already enrolled by reviewing the searchable list of enrolled Medi-Cal providers on the <u>California Health and Human Services Open Data</u> <u>Portal</u>, which may also be downloaded <u>here</u>. This will take the user to a landing page from which they can select their preferred format. If the pharmacist is already enrolled, no further actions are needed. ORP providers are not required or able to link or affiliate their enrollment to pharmacies or other health care businesses through Provider Application and Validation for Enrollment (PAVE).
- Get a type-1 National Provider Identifier (NPI). Any provider who orders, refers, or prescribes goods or services to a Medi-Cal member must be enrolled in Medi-Cal or Medicare with their type-1 (individual) NPI. To apply for a type-1 NPI, visit the National Provider Identifier page of the <u>National Plan & Provider Enumeration System</u> website. Follow the instructions to get an NPI.
 - Note: Providers must apply with their own individual NPI to enroll as an ORP provider. Providers may not use their type-2 (organization) NPI.
- 3. After obtaining an NPI, complete and submit an application to enroll as an ORP provider via the <u>PAVE Portal</u>.

Refer to the following resources located on the PAVE 101 Webinar Training Slides page:

- What is PAVE and Understanding PAVE Terms
- <u>Understanding PAVE User and PAVE Profiles, Application and Account Queues and User Roles</u>
- How to Start a New PAVE Application if You Are New to Medi-Cal Fee-for-Service
- <u>Signing an Application in PAVE</u>
- Ordering, Referring, Prescribing (ORP) Enrollment PowerPoint presentation

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18. Does the pharmacist need to enroll as an Ordering, Referring, and Prescribing (ORP) provider for a pharmacy to bill for a vaccine administration fee only?

Yes, if the pharmacist is initiating and administering the vaccine independently then the pharmacist must be enrolled as a Medi-Cal ORP provider. Refer to **question #16** and **question #17** for more details.

19. Can a pharmacist without a National Provider Identifier (NPI) who is not enrolled as an Ordering, Referring, and Prescribing (ORP) provider administer a vaccine?

Yes, a pharmacist without an NPI and not enrolled as a Medi-Cal ORP provider may administer a vaccine; however, the pharmacist cannot initiate and administer the vaccine independently, but must do so pursuant to a protocol with a prescriber (*Business and Professions Code* [Bus & Prof Code], *Section 4052 [a][11]*) or pursuant to a prescription. The immunizing pharmacist must use the prescriber's NPI in the Prescriber ID field (411-DB) to bill the immunization administration fee.

20. Do pharmacies have to enroll in the Vaccines For Children (VFC) program to vaccinate children 18 years of age and younger with a COVID-19 vaccine?

No. Per the Centers for Disease Control and Prevention (CDC), the VFC program and the COVID-19 vaccination program are currently separate programs, and each program has its own enrollment requirements. Pharmacies need to enroll in the COVID-19 vaccination program to vaccinate individuals aged 3 years and older with COVID-19 vaccines.

21. Are pharmacies required to submit vaccination claims to Medi-Cal on behalf of their pharmacists?

Yes. Pharmacists are unable to bill Medi-Cal directly as they are not Medi-Cal Billing providers. Refer to **question #10**.

22. Are claims for immunization administration under Vaccines For Children (VFC) submitted through Medi-Cal Rx?

Claims for the immunization fee can be submitted either through Medi-Cal Rx for both fee-for-service and managed care plan (MCP) members or as a medical claim to the MCP for MCP members and to the Department of Health Care Services (DHCS)/(California Medicaid Management Information System [CA-MMIS]) for fee-for-service members. The consultation and assessment of the need to vaccinate (vaccination initiation or prescribing), which includes history, examination, and medical decision making, must be submitted on a medical claim as Pharmacist Services to MCPs for MCP members and to DHCS (CA-MMIS) for fee-for-service members. Refer to the <u>Pharmacist Services</u> section in the <u>DHCS Provider</u> <u>Manual</u> for more information about billing Pharmacist Services under fee-for-service.

23. When are newly licensed vaccines required to be covered by Medi-Cal?

As soon as the U.S. Food and Drug Administration (FDA) licenses a vaccine for children, the vaccine must be covered by Medi-Cal, regardless of whether the vaccine has been incorporated into the Vaccines For Children (VFC) program. While the Medi-Cal program covers all Advisory Committee for Immunization Practices (ACIP)-recommended vaccines, updates to the <u>Medi-Cal Rx Provider Manual</u> may lag behind, so the <u>Medi-Cal Rx Provider Manual</u> may lag behind, so the <u>Medi-Cal Rx Provider Manual</u> may not yet reflect current ACIP recommendations. Activation of the fee-for-service reimbursement mechanism may also lag due to systems limitations.

Reimbursement of Pharmacy-Administered VFC Vaccines in Medi-Cal

24. How much are pharmacies reimbursed for vaccines administered to Vaccines For Children (VFC)-eligible members 18 years of age and younger in Medi-Cal fee-for-service?

The Department of Health Care Services (DHCS) will reimburse VFC-enrolled pharmacy providers for the following when the VFC vaccines are administered to VFC-eligible members:

- The VFC Vaccine Administration Fee of \$7.65 (85% of \$9.00 = \$7.65) is reimbursed by Medi-Cal Rx. Billing instructions will be provided based on NCPDP standards for claims submitted to Medi-Cal Rx. This reimbursement amount applies for managed care plan (MCP) members and fee-for-service members through Medi-Cal Rx. It can also be billed as a medical claim to fee-for-service or MCP as applicable.
- 2. The Medi-Cal Rx Professional Dispensing Fee methodology is two-tiered, based on the pharmacy's attested total annual claim volume. A dispensing fee of \$13.20 for a pharmacy with less than 90,000 prescriptions/year (requires provider attestation) or \$10.05 for a pharmacy with 90,000 or more prescriptions/year. Refer to the alert titled *Pharmacy Provider Dispensing Fee Self-Attestation* for more information. This reimbursement amount applies for MCP members and fee-for-service members through Medi-Cal Rx.
- 3. The Vaccine Initiation Fee (consultation and assessment of need for vaccination) billed with CPT codes 99202 (new patient) or 99212 (established patient). Reimbursed at 85% of the physician rate on file:
 - 85% of \$18.10 (99212) = \$15.39; **OR**
 - 85% of \$34.30 (99202) = \$29.16.

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Medi-Cal Reimbursement of VFC-Enrolled Pharmacy Providers and for VFC and 11 Non-VFC Vaccines – FAQs This reimbursement is for fee-for-service members only when billed to DHCS (California Medicaid Management Information System [CA-MMIS]) as a medical claim. Claims for MCP members are billed to the member's MCP. Each MCP determines the reimbursement rate and billing methodology.

4. The VFC Vaccine Cost is **not** reimbursed since the vaccines are supplied free under the VFC program and pharmacy providers should not submit claims for vaccine reimbursement.

Billing Details

Medi-Cal pharmacy providers enrolled with VFC must bill the vaccine administration and consultation fees outlined as follows.

Fee	Billing CPT Code	Reimbursement Amount
VFC Vaccine Administration	 Vaccine Code + SL modifier to: DHCS (CA-MMIS) as a medical claim; OR To Medi-Cal Rx using NCPDP standards for pharmacy claims. 	85% of \$9.00 = \$7.65
Professional Dispensing Fee	To Medi-Cal Rx using NCPDP standards for pharmacy claims.	\$10.05 OR \$13.20 (refer to 2 above)
Pharmacist Services (for initiating and administering vaccine)	 For the evaluation of the patient and medical decision making involved: 99212 (Existing patient); OR 99202 (New patient) to DHCS (CA-MMIS) as a medical claim 	 85% of \$18.10 (99212) = \$15.39; OR 85% of \$34.30 (99202) = \$29.16
	Total	\$33.09 to \$50.01

Fee-for-Service Members

Resources:

- DHCS (CA-MMIS) medical claim questions can be found in the DHCS Provider Manual.
- Refer to the <u>Pharmacist Services</u> section in the DHCS Provider Manual for details on billing Pharmacist Services.
- Refer to the <u>Vaccines For Children (VFC) Program</u> section in the DHCS Provider Manual for more billing details, including vaccine CPT codes for fee-for-service medical claims.
- For fee-for-service medical claim information, pharmacies can contact the CA-MMIS Fiscal Intermediary's Telephone Service Center (TSC) at 1-800-541-5555.

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Managed Care Plan (MCP) Members

Fee	Billing CPT Code	Reimbursement Amount
VFC Vaccine Administration	 Submit to Medi-Cal Rx using NCPDP standards; OR 	 85% of \$9.00 = \$7.65 to Medi-Cal Rx; OR
	 Submit to MCP as a medical claim as instructed by member's MCP 	 Reimbursement amount determined by MCP if submitted as a medical claim.
Professional Dispensing Fee	 Submit to Medi-Cal Rx using NCPDP standards for pharmacy claims. 	\$10.05 OR \$13.20 (refer to item 2 above)
Pharmacist Services (for initiating and administering vaccine)	 For the evaluation of the patient and medical decision making involved: Submit to MCP as a medical claim as instructed by applicable MCP. 	Reimbursement amounts determined by MCP for New or Established patient.
	Total	\$17.70 – \$20.85 plus Pharmacist Services as determined by MCP.

Resources:

- DHCS (CA-MMIS) medical claim questions for fee-for-service can be found in the <u>DHCS</u> <u>Provider Manual</u>.
- Refer to the <u>Pharmacist Services</u> section in the DHCS Provider Manual for details on billing Pharmacist Services.
- Refer to the <u>Vaccines For Children (VFC) Program</u> section in the DHCS Provider Manual for more billing details on medical claims for fee-for-service, including vaccine CPT codes.
- For medical claim information for fee-for-service, pharmacies can contact the CA-MMIS Fiscal Intermediary's TSC at 1-800-541-5555.

Billing a medical claim with modifier to DHCS (CA-MMIS) for fee-for-service members:

All VFC vaccine claims billed to DHCS (CA-MMIS) on a medical claim require an "SL" modifier on the claim submission. This modifier identifies the dose as a *state-supplied vaccine* and ensures that the cost of the vaccine is not reimbursed. The VFC vaccine administration fee will be reimbursed when the vaccine CPT code is listed with an "SL" modifier on the claim form.

25. How are the Vaccines For Children (VFC) Immunization and Consultation/Assessment fees billed as a medical benefit under Pharmacist Services to the Department of Health Care Services (DHCS) (California Medicaid Management Information System [CA-MMIS]) fee-for-service members?

VFC immunization and Pharmacist Services consultation/assessment are billed as follows:

- VFC vaccine administration fee: List each administered vaccine CPT code with an "SL" modifier (state-supplied vaccine). An "SL" modifier ensures that the cost of the vaccine is not reimbursed. Billing details including vaccine CPT codes can be found in the <u>Vaccines For Children (VFC) Program</u> section in the <u>DHCS Provider Manual</u>.
- Consultation and assessment fee (vaccine initiation): Providers must bill fee-for-service claims to the DHCS (CA-MMIS) on a medical claim under Pharmacist Services using CPT codes 99202 (new patient) and 99212 (existing patient). Reimbursement is based on the current methodology found in the <u>Pharmacist Services</u> section in the DHCS Provider Manual. This must be submitted on a *CMS-1500* medical claim form. Refer to the <u>CMS-1500 Submission and Timeliness Instructions</u> section in the DHCS Provider Manual for more information regarding submitting a *CMS-1500* form.

Note: Pharmacy providers must submit medical claims for MCP members under Pharmacists Services to the member's MCPs. Claims for fee-for-service members must be submitted to DHCS (CA-MMIS).

26. How does the billing vary if it is or is not based on a prescription from a physician?

If the Medi-Cal enrolled Ordering, Referring, and Prescribing (ORP) pharmacist initiates the vaccine following an evaluation of the patient (consultation and assessment of need for vaccination), the pharmacist can bill for the evaluation of the patient and medical decision making involved using 99202 or 99212. However, if the pharmacist administers the vaccine based on a physician's prescription, they would be entitled only to the vaccine administration fee (85% of \$9.00 = \$7.65) and the professional dispensing fee.

Note: Billing codes 99202 and 99212 are also billed by physicians and are reimbursable at 100 percent of the rate compared to 85 percent of the rate for pharmacists. Refer to **question #2** for more details.

The Department of Health Care Services (DHCS) (California Medicaid Management Information System [CA-MMIS]) medical claim answers for fee-for-service can be found in the <u>DHCS Provider Manual</u>. Refer to the <u>Vaccines For Children (VFC) Program</u> section in the DHCS Provider Manual for more billing details, including vaccine CPT codes. For fee-for-service medical claim information, pharmacies can contact the CA-MMIS Fiscal Intermediary's Telephone Service Center (TSC) at 1-800-541-5555. For managed care claims, contact the specific managed care plan (MCP).

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Medi-Cal Billing and Reimbursement for VFC and Non-VFC Vaccines

27. How much are pharmacies reimbursed for vaccines administered to adults 19 years of age and older in Medi-Cal fee-for-service?

The Medi-Cal billing and reimbursement are as follows:

- Cost of vaccine: Pharmacies are reimbursed for vaccines in a similar method as other pharmacy claims. Pharmacies are reimbursed based on the lower of Actual Acquisition Cost (AAC) plus a professional dispensing fee, or usual and customary charges. AAC is determined as the lowest of:
 - National Average Drug Acquisition Cost (NADAC), or Wholesale Acquisition Cost (WAC) + 0% if the NADAC is not available; OR
 - Federal Upper Limit (FUL); **OR**
 - Maximum Allowable Ingredient Cost (MAIC).
- Professional Dispensing Fee: This is also paid for as a pharmacy reimbursement for both managed care plan (MCP) and fee-for-service members. The professional dispensing fee methodology is two-tiered, based on total annual (Medi-Cal and non-Medi-Cal) claim volume as follows:
 - \$13.20 when less than 90,000 prescriptions are dispensed. Refer to **question #28** for more details.
 - \$10.05 when 90,000 or more prescriptions are dispensed.
- Vaccine Administration Fee: This is billed on a medical claim form with CPT code 90471 (non-Vaccines For Children [VFC]) or billed on a pharmacy claim form for claims for both MCP and fee-for-service members using NCPDP standards. Claims on a medical claim form must be submitted to MCP for MCP members or to the Department of Health Care Services (DHCS) (California Medicaid Management Information System [CA-MMIS]) for fee-for-service members. Based on Pharmacist Services the immunization administration fee is 85 percent of the physician rate = 85% of \$4.46 = \$3.79.
- Consultation and assessment fee (vaccine initiation): This is reimbursed as described in question #24 by billing CPT codes 99202 or 99212 on a CMS-1500 form.
- For 340B claims, reimbursement is the covered entity's actual drug acquisition cost plus the appropriate professional dispensing fee.

Note: DHCS (CA-MMIS) medical claim answers for fee-for-service claims can be found in the <u>DHCS Provider Manual</u>. Refer to the <u>Vaccines For Children (VFC) Program</u> section in the DHCS Provider Manual for more billing details, including vaccine CPT codes. For medical claim information, pharmacies can contact the CA-MMIS Fiscal Intermediary's Telephone Service Center (TSC) at 1-800-541-5555.

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Medi-Cal Reimbursement of VFC-Enrolled Pharmacy Providers and for VFC and 15 Non-VFC Vaccines – FAQs

28. Can pharmacies receive a fee from Medi-Cal for initiating and administering immunizations for patients in the Medi-Cal fee-for-service program?

Yes. Pharmacies are reimbursed for the initiation and administration of vaccinations in accordance with the statutory authority of <u>Welfare and Institution Code (W&I Code)</u>, <u>Section 14132.968 (3)</u>, under Pharmacist Services when rendered to Medi-Cal members. It also established the rate of reimbursement for Pharmacist Services at 85 percent of the fee schedule for Physician Services. Pharmacist Services must be provided in accordance with the requirements and protocols outlined in the <u>Business and Professions Code (Bus & Prof</u> Code), Section 4052.8 and <u>California Code of Regulations (CCR) Title 16, Section 1746.4</u>.

29. What do pharmacies receive for vaccine administration and Pharmacist Services from a Medi-Cal managed care plan (MCP)?

The Department of Health Care Services (DHCS) capitates payment to the MCPs, who in turn enter into contracts with pharmacies (and other providers) for professional services when billed on a medical claim. MCPs are required to provide a comparable service to that provided by fee-for-service. This means that MCPs must pay for the Pharmacist Services associated with MCP member vaccinations consistent with the requirements of <u>Business</u> <u>and Professions Code (Bus & Prof Code)</u>, Section 4052.8 and California Code of Regulations (CCR) Title 16, Section 1746.4.

If billed on a medical claim, MCPs must pay an administration fee in addition to the cost of the non-Vaccines For Children (VFC) vaccine. Pharmacies contracted with MCPs may only be reimbursed for immunizing members 18 years of age and younger if the pharmacy is enrolled in the VFC program. MCPs must reimburse for the initiation and administration fees but cannot reimburse for the cost of vaccine (vaccine is provided for free by the VFC program).

Note: MCPs may reimburse at rates different than fee-for-service. For details regarding the reimbursement, contact the member's contracted MCP.

30. For health care providers who are part of the Vaccines For Children (VFC) program, what is the Medi-Cal fee-for-service reimbursement rate for administration of the vaccine?

The fee-for-service Medi-Cal reimbursement rate for administration of VFC vaccine cannot exceed \$9.00. This maximum rate is set in *California Code of Regulations* (CCR), Title 22, Section 51503(e). Managed care plans (MCPs) may reimburse their network providers a different amount or by a different method (such as a capitated rate). Providers should confirm vaccine and administration reimbursement rates with each MCP.

Refer to the <u>Vaccines For Children (VFC) Program</u> section in the <u>DHCS Provider Manual</u> for more billing details on fee-for-service claims, including vaccine CPT codes.

31. What are the recommendations for Vaccines For Children (VFC) pharmacy rejections from Medi-Cal managed care plans (MCPs)?

Since Pharmacist Services are capitated to the MCPs, each MCP is in control of their reimbursement, billing methodology, and other issues related to claims processing. Claims issues related to the MCPs should be relayed to each MCP. If notified, the Department of Health Care Services (DHCS) will assist to ensure resolution.

Note: Medi-Cal Rx reimburses the vaccine administration fee for both fee-for-service and MCP members.

32. Can you confirm that a pharmacy could be reimbursed for the Vaccines For Children (VFC) Vaccine Administration Fee and Pharmacist Services fee on the same claim even though the Pharmacist Services fee includes administering the vaccine?

Yes. Technically, 99202 or 99212 covers the pharmacist's evaluation or assessment of the patient to determine the appropriateness of the vaccine and includes history, examination, and medical decision making, not the actual vaccine administration. The actual vaccine administration can be separately billed on a medical claim with the Vaccine CPT Code and "SL" MODIFIER (VFC) or 90471 (non-VFC). For additional information on fee-for-service billing, refer to the <u>Vaccines For Children (VFC) Program</u> section in the <u>DHCS Provider</u> <u>Manual</u>.

33. For the purposes of Pharmacist Services benefit, what are the definitions of New versus Established patients?

New Patient: A new patient is one who has not received professional services from a pharmacist or pharmacy within the past three years. If a new recipient visit has been reimbursed, any subsequent claim for a new recipient service by the same provider, for the same recipient, received within three years, will be reimbursed at the level of the comparable established recipient procedure.

Established Patient: An established patient is one who has received applicable professional services from a pharmacist at the same pharmacy location within the past three years. Determination of new or established recipient status is based on the owner of the medical record, which is generally the pharmacy and not the individual pharmacist providing the service at the time.

34. Is the patient status of "new" or "existing" based on whether the patient has already been to a specific pharmacy location, or pharmacy chain, or another reason?

Yes, a specific pharmacy location establishes a new or existing patient, not a pharmacy chain. For example, if a Medi-Cal adolescent receives the Tdap vaccine at a CVS Pharmacy on F Street and then receives an influenza vaccine at a CVS Pharmacy on Y Street a month later and the patient has never been to either location, both Vaccines For Children (VFC)-enrolled pharmacies would be able to bill 99202 for this patient. Refer to the <u>Pharmacist Services</u> section in the <u>DHCS Provider Manual</u>.

35. What forms must pharmacy providers use for billing immunization under Pharmacist Services?

Pharmacies must bill Pharmacist Services on a *CMS-1500* health claim form or ASC X12N 837P v.5010 transaction. Providers may not submit claims on the *California Specific Pharmacy Claim Form (30-1)* or *California Specific Compound Pharmacy Claim Form (30-4)* when billing for these services. Professional service claims submitted on a (30-1), (30-4), or via the NCPDP standards will be denied. For a billing example of other Pharmacist Services, refer to the <u>Pharmacist Services</u> section in the <u>DHCS Provider Manual</u>. Refer to the <u>Vaccines For Children (VFC) Program</u> section in the DHCS Provider Manual for more fee-for-service billing details, including vaccine CPT codes.

36. When is it appropriate to bill with CPT code 90471 for the vaccine administration fee?

The CPT code 90471-administration fee may only be billed by a pharmacy when a pharmacist within the pharmacy administers a vaccine. Immunizations administered by the recipient or by an outside entity are not billable by the pharmacy.

Note: Managed care plans (MCPs) may have different instructions for billing. It is important to follow the billing instructions of the specific MCP for MCP-enrolled members.

CPT code 90471: Immunization administration (includes percutaneous, intradermal, subcutaneous, or intramuscular injections); one vaccine (single or combination vaccine/toxoid).

Refer to the <u>Vaccines For Children (VFC) Program</u> section in the <u>DHCS Provider Manual</u> for more billing details, including vaccine CPT codes.

37. What training is available for the billing methods required for Pharmacist Services?

The Medi-Cal team hosts seminars throughout California and provides billing assistance service at no cost at the Claims Assistance Room (CAR). The *Medi-Cal Provider Training Workbooks* are available for download and for use at the Medi-Cal provider seminars. The <u>Medi-Cal Learning Portal (MLP)</u> is the easy-to-use, one-stop learning center for Medi-Cal billers and providers. For instructions regarding health claim form completion, refer to the <u>Contact Us</u> page on the Medi-Cal Providers website. For instructions regarding completion

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Medi-Cal Reimbursement of VFC-Enrolled Pharmacy Providers and for VFC and 18 Non-VFC Vaccines – FAQs of a *CMS-1500* health claim form or ASC X12N 837P v.5010 transaction, refer to the <u>CMS-1500 Completion</u> section in the <u>DHCS Provider Manual</u>. For more information, call the Telephone Service Center (TSC) at 1-800-541-5555.

Refer to the <u>Vaccines For Children (VFC) Program</u> section in the DHCS Provider Manual for more billing details on fee-for-service claims, including vaccine CPT codes.

38. What billing guidance is available?

The Department of Health Care Services (DHCS) (California Medicaid Management Information System [CA-MMIS]) fee-for-service resources for medical claims are as follows:

 Refer to the <u>DHCS Provider Manual</u> for billing guidance. These claims will be submitted to Medi-Cal. If you cannot find the answers you need in the DHCS Provider Manual, you may call the Telephone Service Center (TSC) at 1-800-541-5555 or visit the via <u>Contact Us</u> page.

Resources for Submitting Medical Claims:

- Submit paper claims to the CA-MMIS Fiscal Intermediary at the following address:
 - California MMIS Fiscal Intermediary P.O. Box 15700 Sacramento, CA 95852-1700
- Refer to the <u>CMS-1500 Submission and Timeliness Instructions</u> section in the DHCS Provider Manual.
- If billing by ASC X12 837, ensure you are enrolled to submit Computer Media Claims (CMCs).
 - Refer to the <u>Billing Instructions: Acceptable Claims, Attachments and ASC X12N 837</u> <u>v.5010 Transactions</u> section in the DHCS Provider Manual.

Medi-Cal Rx Resources for Pharmacy Claims:

- You can call the Medi-Cal Rx Customer Service Center (CSC) at 1-800-977-2273, which is available 24 hours a day, 7 days a week, 365 days per year.
- For other questions, email Medi-Cal Rx Education & Outreach at <u>MediCalRxEducationOutreach@primetherapeutics.com</u>.