



# Update to Policy and Billing Guidance for Pharmacy Providers on COVID-19 Oral Antiviral, Paxlovid

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November 11, 2022

The Department of Health Care Services (DHCS) is providing the following guidance for pharmacy providers regarding the billing of self-administered COVID-19 oral antiviral drug, Paxlovid, authorized for the treatment of mild-to-moderate COVID-19 when independently initiated and furnished by a pharmacist.

On July 6, 2022, the U.S. Food and Drug Administration (FDA) updated the [Emergency Use Authorization \(EUA\) for Paxlovid](#) to allow pharmacists to prescribe the medication under specific circumstances. With this update, Paxlovid may be prescribed for an individual patient by a state-licensed pharmacist under the conditions of the EUA and the eligibility standards specified in the FDA's [Fact Sheet for Healthcare Providers](#). Additionally, pharmacists must independently initiate and furnish Paxlovid in accordance with the California Board of Pharmacy; refer to the Department of Consumer Affairs (DCA) [Order Waiving Restrictions on Pharmacists Independently Initiating and Furnishing Paxlovid to Individual Patients](#).

DHCS will reimburse pharmacists for the prescribing and/or dispensing of Paxlovid when this is in accordance with a California Board of Pharmacy Waiver and the FDA's EUA.

## Important Billing Instructions

- DHCS will reimburse pharmacists for the prescribing (consultation and assessment of need for treatment) and/or the dispensing of Paxlovid.

- Since the initial supply of Paxlovid is purchased by the federal government and distributed free to pharmacy providers, pharmacy providers will not be reimbursed the ingredient cost but will be reimbursed the professional dispensing fee.
  - Claims for reimbursement of the dispensing fee must be submitted to **Medi-Cal Rx** for processing.
- Claims for the consultation and assessment must be billed to **DHCS** on a medical claim as a Pharmacist Service using Common Procedural Terminology (CPT) codes 99202 (new patient) and 99212 (existing patient) and reimbursed with the current methodology for [pharmacist services](#) found in the *Medi-Cal Provider Manual*.
  - Claims for reimbursement of the consultation and assessment (billed with CPT codes 99202 and 99212) must be submitted on a *CMS 1500* health insurance claim form.
  - Eligible claims must have an ICD-10-CM diagnosis code, **U07.1 (COVID-19)**.
  - DHCS is making a temporary allowance to allow billing with these CPT codes, effective immediately, through the end of the declared public health emergency.

The guidance contained in this directive is only effective for Paxlovid purchased by the federal government. DHCS will provide future guidance on the end date of this policy for the reimbursement of pharmacy provider-purchased medications.

Any concerns regarding delay in reimbursement should not cause pharmacy providers to decline dispensing to Paxlovid patients.

## Contact Information

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 [MediCalRxEducationOutreach@magellanhealth.com](mailto:MediCalRxEducationOutreach@magellanhealth.com).

## Resources

- [CDPH COVID-19 Test-to-Treat-Playbook](#)
- [DCA Waiver Order Waiving Restrictions on Pharmacists Independently Initiating and Furnishing Paxlovid to Individual Patients](#)
- [Frequently Asked Questions on the Emergency Use Authorization for Paxlovid](#)
- [Full Fact Sheet for Healthcare Providers](#)
- [Fact Sheet for Patients and Caregivers](#)
- [Distribution and Ordering of Anti-SARS-CoV-2 Therapeutics \(ca.gov\)](#)

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