

TO: Pharmacy Providers, Physicians, Nurse Practitioners, Certified Nurse Midwives, Physician Assistants, Clinics, Long Term Care Providers, and Hospitals

RE: CMAP COVID-19 Response Bulletin 49: COVID-19 Vaccine Administration – Provided by Pharmacists, Pharmacy Interns and Pharmacy Technicians

Effective for dates of service from December 11, 2020, until the Department (DSS) has notified providers in writing that the state has deemed COVID-19 to no longer be a public health emergency, Coronavirus Disease 2019 (COVID-19) vaccine administration will be eligible for reimbursement for HUSKY Health members (A, B*, C and D) at 100% of the Medicare rate.

*As a reminder, providers are prohibited from collecting cost share for preventive services under HUSKY B.

Administration of the COVID-19 vaccine by pharmacists, pharmacy interns, and pharmacy technicians is allowed by a combination of state and federal authority. Executive Order No. 9Q ("EO 9Q") signed by Connecticut Governor Ned Lamont allows the administration of the COVID-19 vaccine by licensed pharmacists. The U.S. Department of Health and Human Services (HHS), pursuant to the federal Public Readiness and Emergency Preparedness (PREP) Act, has also issued guidance on COVID-19 vaccine administration in the pharmacy. While it remains in effect, the HHS declaration authorizes pharmacists, pharmacy interns, and pharmacy technicians to administer the COVID-19 vaccine to individuals over the age of three.

Therefore, in addition to pharmacists, CMAP will also allow pharmacy interns and pharmacy technicians to administer the vaccine, but only in accordance with all HHS requirements.

The HHS requirements for pharmacists to administer the COVID-19 vaccine are currently set forth in the Fourth Amended Declaration to the PREP Act and other applicable HHS declarations and guidance, including at the following link:

https://www.phe.gov/Preparedness/legal/prepac t/Pages/default.aspx.

Providers are responsible for monitoring and complying with all HHS requirements and guidance, which are subject to change and amendment by HHS at any time.

The Connecticut Department of Consumer Protection (DCP) guidelines for pharmacy interns and registered pharmacy technicians to administer the COVID-19 vaccine have incorporated the current HHS PREP Act guidance and can be found at the following link:

https://portal.ct.gov/-/media/DCP/drug_control/pdf/Vaccination-Guidance-for-Pharmacy-Technicians-and-Pharmacy-Interns-Final.pdf

The HHS guidance also allows for the administration of FDA-authorized or FDAlicensed Advisory Committee on Immunization Practices (ACIP)-recommended vaccines to persons ages three through 18 according to ACIP's standard immunization schedule by pharmacists, pharmacy interns and pharmacy DCP has stated as follows: technicians. "Connecticut will abide by the declaration and will not enforce state laws preempted by it. The administration is dedicated to ensuring as many individuals as possible, including children, receive vaccinations including any scheduled vaccine whose administration was delayed by COVID-19 and the disruptions to well-care

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visits as well as any COVID-19 vaccination available. The administration also recognizes the value of vaccinations that occur as part of the well-care visits and fully supports that activity. Ultimately, the individual seeking to be vaccinated and their parent or guardian should consider all of their options and speak with their primary care practitioner prior to making any decisions about their care." The Department will cover all COVID-19 vaccines administered by individuals authorized to do so in accordance with the HHS declaration (and applicable HHS requirements). as long as the vaccine administration complies with all other applicable requirements.

The Connecticut Medical Assistance Program (CMAP) will reimburse for the administration of the COVID-19 vaccine for members covered under HUSKY A, B, C, and D. CMAP will reimburse the pharmacy (not the pharmacist), for the administration of the vaccine.

Future Guidance

Providers must continue to monitor the CMAP Web site for additional guidance related to COVID-19 vaccine administration. As additional State and Federal guidance is developed or received, CMAP intends to issue subsequent provider bulletins and updates to the COVID-19 Information and FAQs. However, providers are responsible for monitoring and complying with all HHS and DCP requirements and guidance, which are subject to change at any time.

Connecticut's Vaccination Rollout Plan

As part of Connecticut's COVID-19 Response, the CT Department of Public Health (CT DPH) has published the statewide vaccination rollout plan. This plan provides information related to the various rollout phases and the populations eligible under each phase. Additional information regarding vaccine eligibility, how employers can enroll eligible staff for vaccination and common vaccine questions is also maintained as part of the rollout plan. Please refer to the CT DPH Web site at https://portal.ct.gov/DPH/Immunizations/COVI D-19-Vaccine-Providers for more information.

Reimbursement for One-Dose and Two-Dose FDA-Approved COVID-19 Vaccines

Depending on the FDA-approved specifications, each COVID-19 vaccine may require either one or two doses to achieve their expected efficacy. CMAP will reimburse an administration fee for each dose as follows:

For a single-dose vaccine administration: \$28.39

For a two-dose administration:

- \$16.94 for the first dose
- \$28.39 for the second dose

The vaccine is currently being provided at no charge by the federal government; therefore, CMAP will not make any payment for the vaccine itself. The provider will submit a claim with an ingredient cost of \$0.01. There will be no additional dispensing fee.

For a two-dose vaccine, the pharmacy will need to submit an NCPDP Submission Clarification Code (420-DK) on the claim to distinguish between the first and second doses and to ensure proper reimbursement.

The following Submission Clarification Code values should be used to clarify the administration of a first or second dose:

- Submission Clarification Code of 2 "Other Override" to indicate the first dose is being administered
- Submission Clarification Code of 6 "Starter Dose" to indicate the second dose is being administered.

For a single-dose vaccine, the pharmacy will need to submit an NCPDP Submission Clarification Code (420-DK) on the claim to ensure proper reimbursement. • Submission Clarification Code of 6 "Starter Dose" to receive the proper reimbursement on the single dose vaccine claim.

For guidance pertaining to COVID-19 vaccine administration provided by practitioners other than pharmacists, please refer to PB 2021-05 CMAP COVID-19 Response Bulletin 48: COVID-19 Vaccine Administration – Medical Practitioners.

Limited Benefit Groups and Noncitizens

Non-CMAP federal reimbursement for the administration of the COVID-19 vaccine for members covered under the Tuberculosis Limited Benefit, Family Planning Limited Benefit, COVID-19 Testing Group and noncitizens (***individuals who do not qualify for Medicaid or CHIP coverage due to their immigration status) may be available directly through the U.S. Health Resources and Services Administration (HRSA). In recognition of the need to ensure access to COVID related services, HRSA has currently established a provider reimbursement portal for COVID-19 testing, treatment and vaccine administration, but the program is subject to available funding. For information, see COVID-19 Claims Reimbursement to Health Care Providers and Facilities for Testing, Treatment, and Vaccine Administration for the Uninsured & (currently posted to this link:

https://www.hrsa.gov/coviduninsuredclaim)

Questions? For questions about billing or if further assistance is needed to access fee schedules on the CMAP Web site, please contact the Provider Assistance Center, Monday through Friday from 8:00 a.m. to 5:00 p.m. at 1-800-842-8440.

Posting Instructions: Policy transmittals can be downloaded from the Web site at www.ctdssmap.com.

Distribution: This policy transmittal is being distributed to providers of the Connecticut

Medical Assistance Program by Gainwell Technologies.

Responsible Unit

DSS, Division of Health Services, Integrated Care, Herman Kranc, Pharmacy Manager at 860-424-5218 or <u>herman.kranc@ct.gov</u>.

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