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TO: Health Officers, Health Executives, Immunization Coordinators

FROM: John Talarico, DO, MPH *J. Talarico, D.O.*
Chief, Immunization Branch

SUBJECT: 317 Vaccine Finance Policy Change

On July 13th, we notified you that the Centers for Disease Control and Prevention (CDC) notified states of an upcoming change in federal 317 vaccine policy. The CDC's new guidance stipulates that effective October 1st, 2012, 317 vaccine will no longer be able to be used for immunizing insured individuals. Since the letter was sent, we received additional clarification from CDC that 317 funds can be used on underinsured children. To reiterate:

317 vaccine funds may be used to vaccinate the following:

- Underinsured children
- Uninsured or underinsured adults
- Fully insured individuals seeking vaccines during public health response activities including:
 - o Outbreak response
 - o Post-exposure prophylaxis
 - o Disaster relief efforts
 - o Mass vaccination campaigns or exercises for public health preparedness

The terms “underinsured” and “fully insured” are defined as follows:

Underinsured: A person who has health insurance, but the coverage does not include vaccines or a person whose insurance covers only selected vaccines. Children who are underinsured for selected vaccines are VFC-eligible for non-covered vaccines only. Underinsured children are eligible to receive VFC vaccine only through a Federally Qualified Health Center (FQHC) or Rural Health Clinic (RHC).

Fully Insured: Anyone with insurance that covers the cost of vaccine, even if the insurance includes a high deductible or co-pay, or if a claim for the cost of the vaccine and its administration would be denied for payment by the insurance carrier because the plan's deductible had not been met.

The Immunization Branch has updated and developed materials to assist with implementation of this new policy. Enclosed you will find:

- LHD Eligibility Table, effective 10/1/2012
- Insured at LHD Policy, effective 10/1/2012
- Template letter for providers
- LHD screening form
- Signs for posting at LHD clinics.

We are aware that this policy change has tremendous implications for local health departments and the clientele that they serve. We encourage you to contact us with suggestions on how we can support you in implementing this change in vaccine policy.

cc: CDPH Immunization Branch Field Representatives