

California Department of Public Health CA COVID-19 Vaccination Program

COVID-19 Billing and Reimbursement Webinar

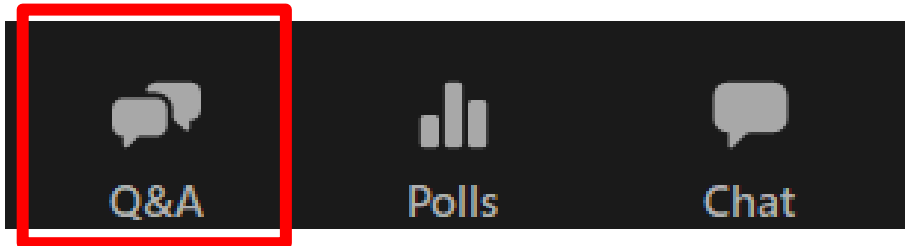
Friday April 29, 2022

12:30PM – 1:30PM



Billing and Reimbursement Webinar Q&A

During today's session, please use the Q&A panel to ask your questions so our subject matter experts can respond directly.



Housekeeping

Reminder to Panelists:



Please mute yourself when not speaking.

Please monitor the Q&A panel for questions you may be able to answer.



Reminder to Attendees:



Today's session is being recorded. Access today's slides and archived presentations at: <https://eziz.org/covid/education/>



For post-webinar-related questions, please email leslie.amani@cdph.ca.gov

Agenda: Friday, April 29, 2022

No.	Item	Speaker(s)	Time (PM)
1	Welcome and Introductions	Leslie Amani (CDPH)	12:30 – 12:35
2	CA Department of Public Health: Welcome and Overview	Rob Schechter, M.D. (CDPH)	12:35 – 12:40
3	California Medical Association: COVID-19 Billing and Reimbursement Guide	Mark Lane (CMA)	12:40 – 12:50
4	Department of Healthcare Services: COVID-19 Billing and Reimbursement	Hisham Rana, M.D. (DHCS) and Cindy Garrett (Medi-Cal)	12:50 – 1:05
5	Question and Answers	Leslie Amani (CDPH)	1:05 – 1:30

Thank you!

California Department of Public Health: Welcome and Overview

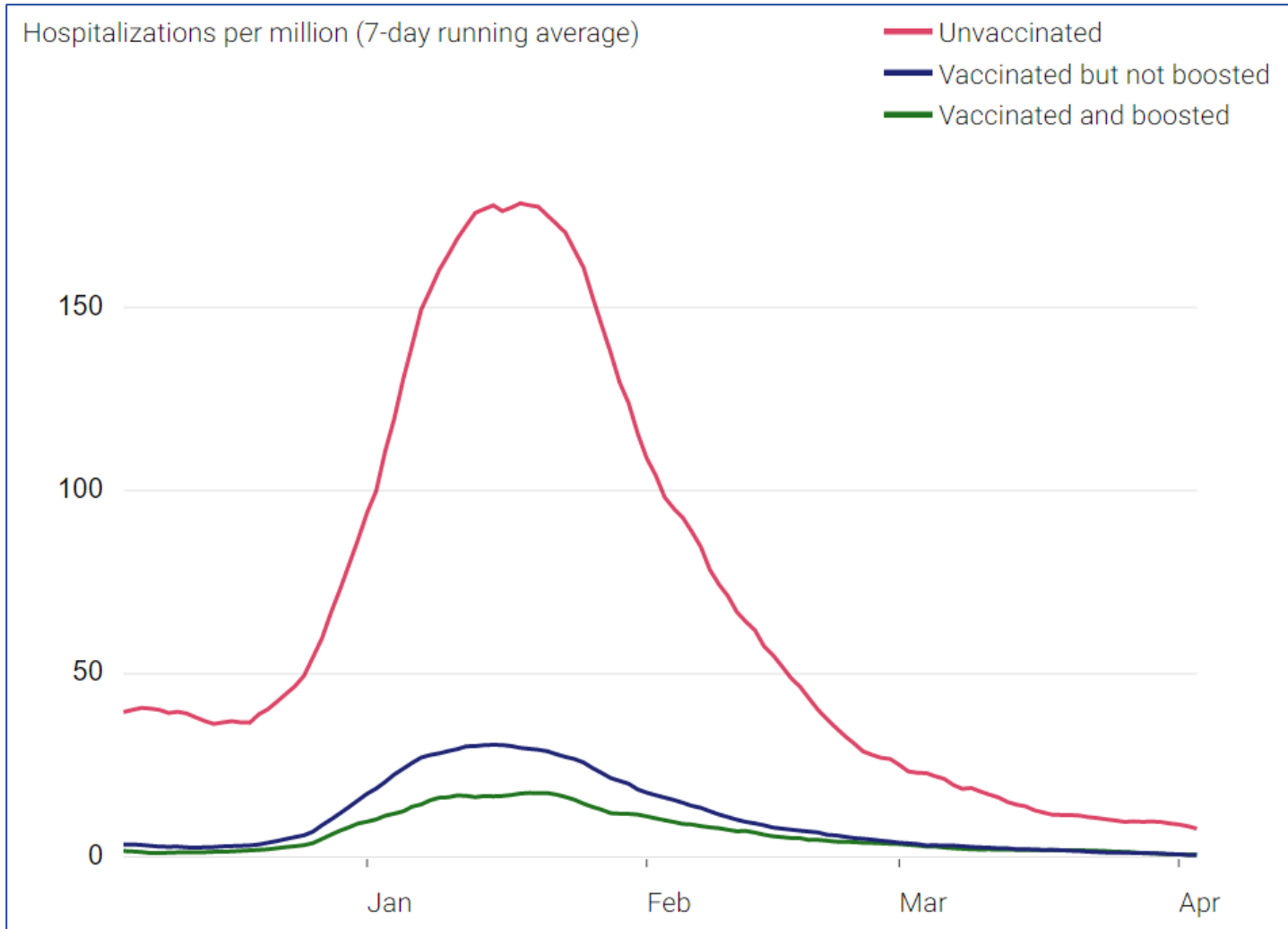
Robert Schechter, M.D., MPH, and Chief, Immunization Branch CDPH

Overview: Billing and Reimbursement Webinar

- Welcome and gratitude for your continued vaccination efforts.
~**75 M doses** of COVID-19 vaccine administered in 16 months!
- Suspension of HRSA reimbursement
Congressional negotiations resuming over COVID-19 funding
- Thanks to CMA and DHCS for their participation today - appreciate their ongoing assistance and partnership.



Please Continue to Vaccinate Regardless of Coverage!



From 3/28/22 - 4/3/22, unvaccinated people were **12.5x more likely** to be hospitalized with COVID-19 than people who received their booster dose.

California Medical Association: COVID-19 Billing and Reimbursement Guide

Mark Lane, Director of CES Publications and Resources, California Medical Association

General Information



- Providers participating in the CDC COVID-19 Vaccination Program have agreed to administer vaccine regardless of an individual's ability to pay/coverage and billing.
- Both public and private payors are required to cover the vaccine administration **without any patient cost sharing**.
- Physicians will be reimbursed for vaccine administration, but may not seek reimbursement from vaccine recipients, including for CPT 99072 (PPE, cleaning supplies, etc.).



AMA CPT Guidance

- In accordance with new vaccine-specific product CPT codes, new vaccine administration codes were created.

Manufacturer	National Drug Code	Vaccine Serum Code	1 st Admin Code	2 nd Admin Code	3 rd Admin Code	Booster Code
Pfizer (Age 12+ yrs)	59267-1000-1 59267-1000-01	91300	0001A	0002A	0003A	0004A
*Pfizer (Age 5-11 yrs)	59267-1055-1 59267-1055-01	91307	0071A	0072A	0073A	0074A
Pfizer (Age 6 months-5 yrs)	59267-0078-1 59267-0078-01 59267-0078-4 59267-0078-04	91308	0081A	0082A	N/A	N/A
Moderna (100 mcg/0.5 mL dosage)	80777-273-10 80777-0273-10	91301	0011A	0012A	0013A	N/A
Moderna (Booster-Age 18+) (50 mcg/0.25 mL dosage)	80777-273-10 80777-0273-10	91306	N/A	N/A	N/A	0064A
Moderna (Booster-Age 18+) (50 mcg/.5 mL dosage)	80777-275-05 80777-0275-05	91309	N/A	N/A	N/A	0094A
Janssen (Johnson & Johnson)	59676-580-05 59676-0580-05	91303	0031A	N/A	N/A	0034A

- Physicians should not bill for the vaccine itself at this time. If accidentally submitted, will be denied.

Claim Submission and Reimbursement



Medicare FFS (Fee-For-Service) Summary

- Claims for Medicare fee-for-service enrollees are reimbursed through Noridian, the Medicare Administrative Contractor
- **Submit claims to Noridian with patient's Medicare FFS ID number**
- Reimbursement = \$40 for each dose required.
- Effective June 8, 2021, Medicare allows additional \$35 payment per dose for administering the COVID-19 vaccine in the home for certain Medicare patients.
- To be paid, physicians MUST have Medicare billing privileges.
 - **Request provisional billing privileges during PHE (Public Health Emergency) - call (866)-575-4067**

Claim Submission and Reimbursement



Medicare Advantage Summary

Medicare Advantage for dates of service prior to January 1, 2022:

- The Centers for Medicare and Medicaid Services (CMS) carved out the COVID-19 vaccine administration benefit from the Medicare Advantage plans and reimbursed under the Medicare fee-for-service system.
- Physicians will need to ensure claims for Medicare Advantage enrollees are submitted directly to Noridian, the Medicare Administrative Contractor.
- Claims must be submitted under the patient's Medicare Beneficiary Identification number indicated on their original Medicare ID card.
 - Obtain Medicare FFS ID # with patient name and SSN [Noridian Medicare Portal](#)



Claim Submission and Reimbursement



Medicare Advantage Summary

Medicare Advantage for dates of service on or after January 1, 2022:


- Claims for Medicare Advantage enrollees must be submitted directly to the Medicare Advantage Plan for processing and reimbursement.
- In-network physicians will be reimbursed at their contracted rate.
- Out-of-network providers must be reimbursed at a “reasonable rate,” which CMS guidance suggests is the Medicare rate for COVID-19 vaccine administration.
- Physicians seeking specific billing or reimbursement guidance should visit the plans websites.



Claim Submission and Reimbursement



Medi-Cal (FFS and Managed Care)

- DHCS carved out COVID-19 vaccine administration benefit from Medi-Cal managed care plans and will reimburse under Medi-Cal FFS system.
- **Submit claims to Medi-Cal FFS with patient's Medi-Cal benefit ID number (not Medi-Cal managed care number).** 
- Reimbursement - \$40 for each dose required.
- **To be paid, physicians MUST be enrolled in MCal system.**
 - Streamlined emergency MCal enrollment process - [DHCS PAVE](#)

Claim Submission and Reimbursement



Medi-Cal/Medi-Cal Managed Care reimbursement for FQHCs, RHCs and Tribal FQHCs

- On March 2, 2022, CMS approved the DHCS State Plan Amendment (SPA 21-0020) providing coverage and reimbursement of COVID-19 vaccine administration services provided by Federally Qualified Health Centers (FQHC), Rural Health Centers (RHC) and Tribal RHCs.
- Reimbursement rate is **\$67 per shot** for COVID-19 vaccine administration only encounters.
- The reimbursement rate is retroactive to November 2, 2020.
- DHCS will automatically reprocess claims previously submitted at the lower of either the \$67 rate or the billed charge if less than \$67.
- DHCS will waive timely filing requirements for providers that appropriately held COVID-19 vaccine claims, as instructed.




[FQHC, RHC, Tribal FQHS Providers COVID-19 Vaccine Claims Overview](#)

Claim Submission and Reimbursement



Fully Insured Commercial Health Plans and Insurers

- Submit claims to plan or delegated group as you normally would, unless notified otherwise by health plan/delegated group.
 - **Blue Shield HMO claims-bill Blue Shield directly, rather than delegated group.** 
- Submit claims to insurers as you normally would.
- Reimbursement – even if you’re contracted with the payor, providers may be considered out-of-network for reimbursement rate purposes per DMHC guidance on implementation of SB 510.

Claim Submission and Reimbursement



Impact of SB 510 on Fully Insured Commercial Plan/Insurer Reimbursement

- SB 510, effective Jan 1, 2022, but is retroactive to March 4, 2020, prohibits health plans/insurers from delegating the financial risk for SB 510 services to a contracted provider unless the parties have agreed upon a new provision of the contract.
- Reimbursement – Per DMHC [APL 22-014](#), if a plan and provider had a contract that generally delegated vaccine services to the provider/delegated group and did not have a “specifically negotiated rate” in effect **before** the PHE for the COVID vaccine admin service, the provider is considered non-contracted for payment purposes.
 - For out-of-network COVID-19 vaccine administration services, plans must reimburse in an amount that is reasonable as determined in comparison to prevailing market rates. Per the APL, that reimbursement rate is satisfied if it is an amount that is at least 125% of Medicare FFS rates in the geographic region where services are provided.
 - Reminder – Providers are required to accept this as payment in full and balance billing of patients is not allowed.
- **Retroactivity of the bill is currently being challenged in the courts, however per APL 22-014, DMHC expects plans to reimburse for services provided 3/4/20 – 12/31/21 by July 1, 2022. Violations may result in administrative and/or civil penalties on the plan.**



Claim Submission and Reimbursement



Uninsured Patients

- As part of the Provider Relief Fund, physicians were reimbursed for administering COVID-19 vaccine to the uninsured by the U.S. Department of Health and Human Services' Health Resources and Services Administration (HRSA).
- Due to lack of funding, HRSA halted acceptance of claims for vaccine administration as of April 5, 2022.
- **Any vaccine administration claims submitted through their Provider Portal after April 5, 2022, will not be adjudicated for payment.**
- Reimbursement was at the Medicare rate (\$40/shot).
- For more information, see the HRSA website - [HRSA Contact Information](#) or




HRSA FAQ - [HRSA COVID-19 Uninsured Program Claims Submission Deadline FAQs](#)

Claim Submission and Reimbursement



Uninsured Patients

Providers may wish to explore the DHCS COVID-19 Uninsured Group Program for reimbursement of COVID-19 vaccine admin services.

- The provider must be a Qualified Provider participating in the Presumptive Eligibility Program or become qualified.
- Patients would also need to apply for the special Medi-Cal access. 
- For more information, visit the DHCS FAQs: [COVID-19 Unisured Group FAQs](#)

Claim Submission and Reimbursement



Self-Funded/ERISA (Earned Retirement Income Security Act) Plans

- CARES Act requires self-funded plans to cover administration of COVID-19 vaccines with no patient cost sharing for in- or out-of-network providers during national public health emergency.
- During the PHE, self-funded/ERISA plans must reimburse out-of-network providers at a reasonable rate, as determined in comparison to prevailing market rates for such service, citing Medicare reimbursement rates as an example (\$40/shot).



Vaccine Administration Resources

- [CMA COVID-19 Vaccine Toolkits and Resources](#) that includes the [CMA Vaccine Reimbursement Summary Guide](#)
- CMS COVID-19 Insurers Toolkit [CMS COVID-19 Vaccine Toolkit](#)
- [DHCS COVID-19 Med-Cal Response Webpage](#)
- Personalized claims support for CMA members and their staff **(888) 401-5911**

Department of Healthcare Services: COVID-19 Reimbursement and Billing

Dr. Hisham Rana, Department of Health Care Services

Cindy Garrett, Provider/Member Services Director, Medi-Cal Business Operations Fiscal Intermediary

DHCS COVID-19 Vaccine Administration

- Introductions and scope
 - Medi-Cal Fee for Service (FFS) policy as implemented
- DHCS received federal approval to help support delivery of the vaccine to all Medi-Cal beneficiaries at no cost.
 - The federal approval covers the cost of vaccine administration for beneficiaries in specific programs (February 2022), including the COVID-19 Uninsured Group
- DHCS expanded the types of providers who could administer the COVID-19 vaccines in Q3 2021 and Q1 2022
- DHCS later received State Plan Amendment (SPA) approval to reimburse the distinct types of providers for vaccine-only administration. Most recently instruction for following provider types was published:
 - Federally Qualified Health Centers (FQHCs), Rural Health Center (RHCs), and Tribal FQHCs (April 2022)

DHCS COVID-19 Vaccine Administration

- Reimbursement for vaccine administration is exclusively through the fee-for-service (FFS) delivery system and carved out from all managed care contracts.
- As of January 1, 2022, pharmacy claims for administration of the COVID-19 vaccine must be submitted to the FFS pharmacy program: Medi-Cal Rx, regardless of date of service.
- All other types of providers must continue to bill the FFS Medi-Cal program for vaccine administration reimbursement.

DHCS COVID-19 Vaccine Administration

Consistent with State and federal guidance, the following vaccine manufacturers, doses, and boosters are reimbursable by FFS Medi-Cal, unless otherwise indicated in the chart at right.

Refer to the FFS [Medi-Cal Rx website](#) for pharmacy specifics.

Dose	Manufacturer		
	Pfizer-BioNTech	Moderna	Janssen
First Dose	Yes*+	Yes	Yes
Second Dose	Yes*+	Yes	NA
Third Dose	Yes+	Yes	NA
First Booster Dose	Yes+	Yes^	Yes
Second Booster Dose	No	No^	NA
* For all approved or authorized ages			
+ For all approved or authorized formulations			
^ FFS Medi-Cal currently cannot process the Moderna formulation defined under CPT code 0094A. Project efforts in flight, targeted for Q2/Q3			

Current FFS COVID-19 Medi-Cal Billing Policy

For Pfizer, FFS Medi-Cal providers must bill vaccine administration using the CPT® administration codes shown. Pharmacy providers must bill vaccine administration using National Drug Codes (NDCs). Refer to the [Medi-Cal Rx website](#) for details.

Legend:
 *For individuals 16 years of age and older
 ^For individuals 12 years of age and older
 +For individuals 5 through 11 years of age
 **For immunocompromised individuals 12 years of age and older
 ^^For immunocompromised individuals 5 years of age and older
 ++For individuals 12 years of age and older, at least 5 months after the primary vaccination series
 ***For individuals 16 years of age and older, at least 6 months after the primary vaccination series
 ^^For individuals 18 years of age and older, at least 6 months after the primary vaccination series
 +++For individuals 65 years of age and older; or age 18+ living in long term care settings; or who have underlying medical conditions; or who work/live in high-risk settings; or 18+ who are moderately and severely immunocompromised, and its at least 6 months after the primary vaccination series

Manufacturer	CPT® Administration Code	Effective Date	Max. Allowable Reimbursement for DOS on or after 12/11/2020 through 3/14/2021	Max. Allowable Reimbursement for FQHC/RHC/ Tribal FQHC on or after 12/11/2020	Max. Allowable Reimbursement for DOS on or after 3/15/2021
Pfizer-BioNTech Dose 1	0001A Original formulation	12/11/2020* 5/10/2021^	\$16.94	\$67.00	\$40.00
	0051A Tris formulation				
	0071A Pediatric formulation	10/29/2021+	NA		
Pfizer-BioNTech Dose 2	0002A Original formulation	12/11/2020* 5/10/2021^	\$28.39	\$67.00	\$40.00
	0052A Tris formulation				
	0072A Pediatric formulation	10/29/2021+	NA		
Pfizer-BioNTech Dose 3	0003A Original formulation	8/12/2021**	NA	\$67.00	\$40.00
	0053A Tris formulation				
	0073A Pediatric formulation	1/3/2022^^			
Pfizer-BioNTech Booster 1	0004A Original formulation	1/3/2022++ 12/9/2021***	NA	\$67.00	\$40.00
	0054A Tris formulation	11/19/2021^^^ 9/22/2021+++			

Current FFS COVID-19 Medi-Cal Billing Policy

For Moderna, FFS Medi-Cal providers must bill vaccine administration using the CPT® administration codes shown. Pharmacy providers must bill vaccine administration using National Drug Codes (NDCs). Refer to the [Medi-Cal Rx website](#) for details.

Manufacturer	CPT® Administration Code	Effective Date	Max. Allowable Reimbursement for DOS on or after 12/18/2020 through 3/14/2021	Max. Allowable Reimbursement for FQHC/RHC/ Tribal FHQC on or after 12/18/2020	Max. Allowable Reimbursement for DOS on or after 3/15/2021	Max. Allowable Reimbursement for DOS on or after 10/20/2021
Moderna Dose 1	0011A	12/18/2020*	\$16.94	\$67.00	\$40.00	NA
Moderna Dose 2	0012A	12/18/2020*	\$28.39	\$67.00	\$40.00	NA
Moderna Dose 3	00013A	8/12/2021+	NA	\$67.00	\$40.00	NA
Moderna Booster 1	0064A	1/7/2022^ 11/19/2021** 10/20/2021^^	NA	\$67.00	NA	\$40.00

Legend: *For individuals 18 years of age and older

+For immunocompromised individuals 18 years of age and older

^For individuals 18 years of age and older, and at least 5 months after the primary vaccination series

**For individuals 18 years of age and older, and at least 6 months after the primary vaccination series

^^For individuals 65 years of age and older. Or age 18+ living in long term care settings, or who have underlying medical conditions, or who work/live in high-risk settings, or 18+ who are moderately and severely immunocompromised

Current FFS COVID-19 Medi-Cal Billing Policy

For Janssen, FFS Medi-Cal providers must bill vaccine administration using the CPT® administration codes shown. Pharmacy providers must bill vaccine administration using National Drug Codes (NDCs). Refer to the [Medi-Cal Rx website](#) for details.

Manufacturer	CPT® Administration Code	Effective Date	Max. Allowable Reimbursement for DOS on or after 2/27/2021 through 3/14/2021	Max. Allowable Reimbursement for FQHC/RHC/ Tribal FHQC on or after 2/27/2021	Max. Allowable Reimbursement for DOS on or after 3/15/2021
Janssen Dose 1	0031A	2/27/2021*	\$28.39	\$67.00	\$40.00
Janssen Booster 1	0034A	10/20/2021+	NA	\$67.00	\$40.00

Supplemental Rate for Administration of COVID-19 Vaccine in Home Setting

- Effective for DOS (Date of Service) on or after 6/8/2021, Medi-Cal will reimburse providers an *additional* \$35.00 per dose when administering a COVID-19 vaccine in the home of a beneficiary who is unable to travel to a vaccination site.
- The supplemental administration fee is designed to target Medi-Cal beneficiaries that have difficulty leaving the home. Detailed policy is available [here](#).

Providers Holding Submissions of Claims May Now Submit

Providers were previously instructed to continue vaccine administration but hold billing for the following programs and or provider entity types:

- Home Health Agency (HHA) Services and Home and Community-Based Services (HCBS)
 - Tuberculosis Program, Family PACT or COVID-19 Uninsured Group
 - FQHC, RHC, or Tribal FQHC
-
- These above billing holds have been lifted.
 - Medi-Cal will waive the timeliness standard for vaccine administration claims for a finite period of time.
 - Providers are required to use Delay Reason Code “10” and provide documentation indicating that the vaccine was administered in the Remarks area of the claim or electronic submission equivalent.
-
- Erroneous Payment Correction (EPC)
 - EPCs for the aforementioned programs and/or provider entity types will be implemented to reprocess any denied claims. Where applicable, claims will also be reprocessed via EPC if the claims were previously reimbursed at a lower max. allowable amount or if the amount billed was greater than or equal to the current allowed amount at time of initial submission.

Coming Soon: Second Booster Dose for Select COVID-19 Vaccines

- Effective for DOS on or after 3/29/2022, the U.S. Federal Drug Administration amended the Emergency Use Authorization for Pfizer-BioNTech and Moderna COVID-19 vaccines.
- Pfizer-BioNTech:
 - Individuals 12 years of age or older with certain kinds of immunocompromise.
 - Individuals 50 years of age and older.
- Moderna:
 - Individuals 18 years of age or older with certain kinds of immunocompromise.
 - Individuals 50 years of age and older.
- DHCS is pursuing the requisite system and operational changes required to enable claims adjudication for either second booster dose and to accept CPT code 0094A.
 - Pfizer-BioNTech booster 2 implementation target: May 2022.
 - Moderna booster 2 and CPT code 0094A implementation target: June 2022.
- Providers are advised to administer the booster dose to the eligible populations and hold claim submission until further notice.

Resources for FFS Medi-Cal

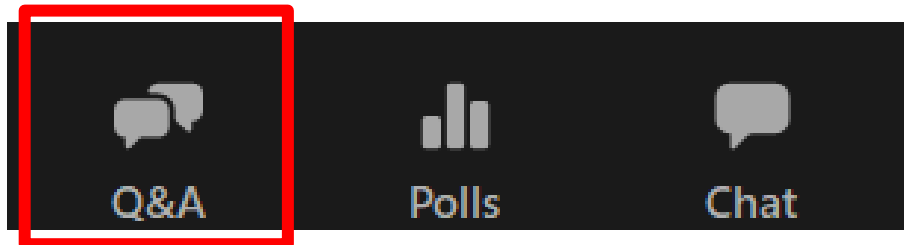
- For current COVID-19 Medi-Cal policy, see the COVID-19 Medi-Cal Response page on the Medi-Cal Provider website here:
https://files.medi-cal.ca.gov/pubsdoco/COVID19_response.aspx
- For current Medi-Cal policy on the respective COVID-19 vaccines see the following web pages:
 - Pfizer-BioNTech: https://files.medi-cal.ca.gov/pubsdoco/Pfizer_BioNTech_COVID19_Vaccine.aspx
 - Moderna: https://files.medi-cal.ca.gov/pubsdoco/Moderna_COVID19_Vaccine.aspx
 - Janssen: https://files.medi-cal.ca.gov/pubsdoco/Janssen_COVID19_Vaccine.aspx
- For general claim submission instructions for Medi-Cal providers, refer to the appropriate Medi-Cal Provider Manual:
<https://files.medi-cal.ca.gov/pubsdoco/Publications.aspx>
- For other ways to contact Medi-Cal with questions, refer to the Medi-Cal Contact page on the Medi-Cal Provider website:
<https://files.medi-cal.ca.gov/pubsdoco/contact.aspx>
- Provider billing questions: (800) 541-5555 (8AM – 5PM M-F, excluding holidays)

Resources for FFS Medi-Cal Rx

- Medi-Cal Rx website
<https://medi-calrx.dhcs.ca.gov/home>
- Medi-Cal Rx Provider Manual
<https://medi-calrx.dhcs.ca.gov/home/provider-manual>
- Medi-Cal Rx Bulletins & News
<https://medi-calrx.dhcs.ca.gov/provider/pharmacy-news/>
- Medi-Cal Rx Contract Drugs List
<https://medi-calrx.dhcs.ca.gov/home/cdl>
- Provider billing questions: (800) 977-2273 (24/7/365)

Billing and Reimbursement Webinar Q&A

During today's session, please use the **Q&A panel** to ask your questions, so our subject matter experts can respond directly.



Wrap-up

Leslie Amani, CDPH



Thank you for attending today's
COVID-19 Billing and Reimbursement Webinar!