**COVID-19 Vaccine Billing Guidance**

The light at the end of the tunnel is approaching as *Operation Warp Speed* delivered COVID-19 vaccines to healthcare workers and LTC residents in December 2020. There will certainly be bumps in the road, supply chain delays and allocations, which means that most patients will not be able to receive COVID-19 vaccines until mid- to late 2021.

The federal government has pre-paid for millions of vaccine doses and will be distributing them to health care providers at no cost, which means that when government-supplied vaccine becomes available at community pharmacies, you will not have to pay to acquire it. For vaccine doses supplied by the federal government, pharmacies may NOT charge **patients** for the vaccine itself, but may bill payers for the administration. The federal government has mandated coverage under Medicare Part B, Medicaid and Commercial insurance with no out-of-pocket costs to patients. The CARES Act also provides for reimbursement for uninsured patients through the Health Resources & Services Administration (HRSA).

|  |  |
| --- | --- |
| **Payer** | **Coverage and Billing Considerations** |
| **Medicare Part B** | * PHARMACY must enroll as Part B Provider (either as supplier type *Pharmacy* or *Mass Immunizer*) * Medicare Advantage patients will have vaccine administration covered under FFS * You will need a medical billing intermediary such as FDS, OmniSys, Change Healthcare, or EBS * Two-dose vaccine administration reimbursement = 1st dose $16.94, 2nd dose $28.39 * Single-dose vaccine administration reimbursement = $28.39 |
| **Medicaid** | * May be covered under pharmacy or medical benefit * All programs required to cover – FFS and Medicaid MCO * Reimbursement will vary |
| **Commercial** | * May be covered under pharmacy or medical benefit * Payers MUST cover it for both in-network AND out-of-network providers * Reimbursement will vary |
| **Uninsured** | * Pharmacies may bill [HRSA](https://coviduninsuredclaim.linkhealth.com/) – managed by “Optum Pay” (must be contracted) – not the same as OptumRx |

The coverage for COVID-19 vaccine may be under the pharmacy benefit (via NCPDP standard) or the medical benefit (via CPT codes). Here is a summary of billing information known to PAAS National® as of December 23, 2020.

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Pharmacy Benefit\*** | | | | | **Medical Benefit** | | |
| **Vaccine** | **NDC-11** | **Billing Quantity & Units** | **Days’ Supply** | **Dose 1** | **Dose 2** | **CPT Codes** | **Dose 1** | **Dose 2** |
| Pfizer BioNTech1 | 59267-1000-01 | 0.3 mL | 1 | SCC-02 to indicate “first dose” | SCC-06 to indicate “final dose” | 91300 | 0001A | 0002A |
| Moderna2 | 80777-0273-10 | 0.5 mL | 1 | 91301 | 0011A | 0012A |

(1) Pfizer BioNTech vaccine has a package size of 1.5 mL and will deliver 5 doses of 0.3 mL

(2) Moderna vaccine has a package size of 5 mL and will deliver 10 doses of 0.5 mL

NCPDP also recommends that pharmacy claims will need to submit the following for ZERO-COST vaccines:

1. *Professional Service Code* (440-E5) of “MA” (Medication Administered)
2. *Ingredient Cost Submitted* (409-D9) of $0.00 or $0.01
3. *Incentive Amount Submitted*(438-E3) to request payment for administration (e.g., $16.94 or $28.39)
4. *Basis of Cost Determination*(423-DN) of “15” (free product or no associated cost)

In general, vaccine claims are low risk for PBM audits; however, audits are always possible, and you should be prepared with good documentation. The PREP Act authorized pharmacists to order and administer the COVID-19 vaccine. PAAS recommends pharmacies create a placeholder “prescription” for your records; many pharmacies already do this when billing for other vaccines under protocol. Additionally, it will be necessary to document the administration through a Vaccine Administration Record as well as provide the patient with an [EUA fact sheet](https://www.fda.gov/emergency-preparedness-and-response/coronavirus-disease-2019-covid-19/covid-19-vaccines) (in place of a vaccine information sheet).

**PAAS Tips:**

* See [CDC website](https://www.cdc.gov/vaccines/covid-19/info-by-product/index.html) for additional COVID-19 vaccine product information
* See [NCPA’s COVID-19 Vaccine Information](https://ncpa.org/covid-vaccine) page for numerous resources
* [NCPDP Emergency Preparedness Guidance – COVID-19 Vaccines 1.0](https://ncpdp.org/NCPDP/media/pdf/NCPDP-Emergency-Preparedness-Guidance-COVID-19-Vaccines.pdf?ext=.pdf) has a billing matrix for numerous scenarios
* See your medical billing intermediary for more details on billing Medicare Part B
* See your state Medicaid agency, health department and pharmacy association for local resources
* See [HRSA website](https://www.hrsa.gov/coviduninsuredclaim) for information about uninsured patients

***PAAS National® is committed to serving community pharmacies and helping keep hard-earned money where it belongs. Contact us today at (608) 873-1342 or info@paasnational.com to see why membership might be right for you.***

**By Trenton Thiede, PharmD, MBA, President at PAAS National®, expert third party audit advice and FWA/HIPAA compliance.**

© 2021 PAAS National® All Rights Reserved