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DATE: September 29, 2021

ALL PLAN LETTER 20-022 (REVISED)

TO: ALL MEDI-CAL MANAGED CARE HEALTH PLANS

SUBJECT: COVID-19 VACCINE ADMINISTRATION

PURPOSE: The purpose of this All Plan Letter (APL) is to provide Medi-Cal managed care health plans (MCPs) with information and guidance regarding COVID-19 vaccine coverage and administration in the Medi-Cal program. Revised text is found in *italics*.

BACKGROUND:

On March 11, 2021, President Joe Biden signed into law H.R. 1319, the American Rescue Plan (ARP) Act of 2021.¹ Section 9811 of the ARP established a new mandatory Medicaid benefit and amended various other sections of the Act. Under these changes to the statute, nearly all Medicaid populations must receive coverage of COVID-19 vaccines and their administration, without cost-sharing. The Department of Health Care Services (DHCS) has been seeking federal approval to help support delivery of the vaccines to all Medi-Cal beneficiaries. The vaccines will be provided at no cost to all beneficiaries.

DHCS is following California's COVID-19 vaccination plan, *and California's COVID-19 Vaccine Action Plan*, which was approved by the California Department of Public Health (CDPH).^{2,3} California is leveraging its existing immunization framework and emergency response infrastructure to coordinate efforts between state, local, and territorial authorities to administer the vaccines. Throughout this effort, DHCS will be sharing appropriate information with providers, MCP partners, other key stakeholders, and Medi-Cal beneficiaries.

Consistent with the approach being taken by Medicare through Medicare Advantage Plans, DHCS will carve out the COVID-19 vaccines and associated administration fees

¹ H.R. 1319 – ARP Act of 2021 can be accessed at the following link:

<https://www.congress.gov/bill/117th-congress/house-bill/1319/text>

² For further information on the state's vaccination planning efforts, please visit:

<https://covid19.ca.gov/vaccines/>

³ The COVID-19 Vaccine Action Plan can be accessed at the following link:

<https://www.cdph.ca.gov/Programs/CID/DCDC/CDPH%20Document%20Library/COVID-19/Vaccine-Action-Plan.pdf>

from the Medi-Cal managed care delivery system and will reimburse providers under Medi-Cal fee-for-service (FFS) for medical, pharmacy, and outpatient claims. This approach will ease program administration, eliminate challenges with out-of-network provider reimbursements, and keep vaccine administration fee rates consistent for providers regardless of delivery system.

As the federal government will pay for the vaccines, there will be no Medi-Cal provider reimbursement for the COVID-19 vaccines themselves. However, providers will be able to bill Medi-Cal FFS for the COVID-19 vaccine administration fees, on medical, outpatient, and pharmacy claims, based on current policy.

DHCS received federal approval to reimburse the associated COVID-19 vaccine administration fee at the allowable Medicare rate for all Medi-Cal claims (medical, outpatient, and pharmacy), based on the number of required doses for full-scope Medi-Cal beneficiaries.⁴ DHCS is also seeking federal approvals to pay Federally Qualified Health Centers and Rural Health Centers for the vaccine administration fees outside of their current Prospective Payment System or All Inclusive Rate; Tribal 638 clinics have received federal approval for this payment.⁵

DHCS continues to closely monitor and respond to COVID-19, and is providing information on the COVID-19 Medi-Cal response webpage to all providers as a reminder of recommended safety procedures and protocols from the Centers for Disease Control and Prevention (CDC) and CDPH to help prevent spread of COVID-19. DHCS issued initial policy guidance on the COVID-19 vaccine administration and reimbursement policy, and is providing updates on an ongoing basis, as necessary. MCPs and providers are encouraged to continually check this COVID-19 Medi-Cal response webpage for information and regular updates to the Medi-Cal response to COVID-19.^{6,7}

DHCS will also be providing call center scripts for DHCS operated call centers, the Medi-Nurse Advice Line and MCP and county partners so all are providing consistent messaging regarding COVID-19 vaccine coverage in Medi-Cal.

⁴ See State Plan Amendment (SPA) 20-0040 at the following *link*:

<https://www.dhcs.ca.gov/Documents/COVID-19/CA-20-0040-Approval-Package.pdf>

⁵ See SPA 20-0040.

⁶ The COVID-19 Medi-Cal Response webpage can be accessed at the following link:

https://files.medi-cal.ca.gov/pubsdoco/COVID19_response.aspx

⁷ For more information, *please* see the DHCS COVID-19 Vaccine Administration FAQs for Providers, which is available on the COVID-19 Medi-Cal Response webpage.

Additional Information

Pharmacies, retail clinics, providers, and any other sites of care must sign an agreement with the U.S. government to receive free supplies of the COVID-19 vaccines.

Under the agreement, all providers must vaccinate individuals regardless of existing health coverage or the type of coverage. Providers are prohibited from balance billing or otherwise charging vaccine recipients.

Blue Shield of California has transitioned from its role as third-party administrator to an advisory role in the California COVID-19 Vaccination Program, as needed. CDPH will resume leading day-to-day operations and oversight of the California COVID-19 Vaccination Program, in partnership with Local Health Departments (LHD). All current and prospective COVID-19 vaccine providers must hold the appropriate credentials and licensing in the jurisdiction where vaccination will take place, meet federal and state requirements, and have the capacity to properly maintain and administer the COVID-19 vaccine. CDPH is working with LHDs and the California Medical Association to ensure that all eligible providers can receive and administer the vaccines.⁸

Vaccine recipients must be provided with emergency use authorization fact sheets about the vaccines (*for vaccines administered under emergency use*) and vaccination cards identifying the brand of vaccine administered.

Providers must administer the vaccines in accordance with the CDC and Advisory Committee on Immunization Practices (*ACIP*) requirements, and they must meet storage and recordkeeping requirements, including recording the administration of the vaccines to patients in their own systems within 24 hours and to public health data systems within 72 hours.

Providers will be expected to bill Medi-Cal FFS for COVID-19 vaccine administration using the claim forms and electronic media used today, unless otherwise noted. Billing specifics for the different provider communities and program areas will be released on an ongoing basis, as necessary. MCPs and providers are encouraged to continually check the COVID-19 Medi-Cal response webpage for information and regular updates to the Medi-Cal response to COVID-19.

⁸ For more provider information about the California COVID-19 Vaccine Program, including enrollment requirements, please see California COVID-19 Vaccination Program Provider Frequently Asked Questions at the following link:
<https://eziz.org/assets/docs/COVID19/Vax58ProviderFAQs.pdf>

POLICY:

Although the COVID-19 vaccines and associated administration fees will be carved out of the Medi-Cal managed care delivery system to Medi-Cal FFS, including in-home vaccinations, MCPs are reminded that they remain contractually responsible for providing case management and care coordination for their members regardless of whether or not they are financially responsible for the payment of services.

MCPs are encouraged to identify opportunities to use their existing communication pathways to support dissemination of CDPH COVID-19 public health education materials and provider education resources. MCPs should utilize their existing data sources to help identify members who qualify to receive the COVID-19 vaccine in accordance with CDPH guidelines, and attempt outreach to qualifying members and their providers to encourage receipt of the COVID-19 vaccines. MCPs are responsible for coordinating medically necessary care. Care coordination may involve, but is not limited to, assisting members with accessing COVID-19 vaccine administration locations, including non-emergency medical transportation and non-medical transportation as needed, and helping members receive the required number of doses for the COVID-19 vaccines in a timely fashion.

As mentioned above, DHCS will be issuing guidance on COVID-19 vaccine administration and reimbursement policies and will be providing call center scripts for MCP use, on a rolling basis. MCPs must ensure they convey relevant and current information on the COVID-19 vaccines to members, including the use of any customer call center scripts or other communications authorized for use by DHCS. MCPs should encourage providers to communicate with members about vaccination availability as such information is made available.

MCPs must also ensure that their Subcontractors and Network Providers are following guidance issued by DHCS related to the administration of the COVID-19 vaccines.⁹ MCPs are encouraged to disseminate information about the administration of the COVID-19 vaccines to their Subcontractors and Network Providers and provide any available resources and information as it becomes available from the CDC, DHCS, CDPH, and other state departments. MCPs are encouraged to continually check the COVID-19 Medi-Cal response webpage for information and regular updates to the Medi-Cal response to COVID-19.

⁹ For more information on Subcontractors and Network Providers, including the definition and requirements applicable, *please* see APL 19-001, and any subsequent APLs on this topic. APLs are available at: <https://www.dhcs.ca.gov/formsandpubs/Pages/AllPlanLetters.aspx>

COVID-19 Vaccine Administration

CDPH provides guidance on vaccine priorities and allocations.¹⁰ Currently, vaccines may be given to every Californian age 12 and older, *in accordance with CDC and ACIP guidelines*.¹¹ The “My Turn” website tells Californians if they qualify to get the COVID vaccine and schedule appointments. Users submit information about their age and can sign up to be notified over text or email when it’s their turn to get vaccinated and then schedule appointments.¹² DHCS would like to emphasize that health care providers should still use their clinical judgement to prioritize and vaccinate individuals who are deemed to be at the very highest risk for morbidity and mortality from COVID-19.

MCP members can call their MCP for assistance in booking a vaccine appointment and arranging transportation to that appointment. MCPs must assist in coordination of vaccine services and transportation, as needed. The MyTurn website has a check box that asks if an individual needs transportation to a vaccine appointment, or is homebound because they are unable to leave home due to limited mobility or fragile health and need a vaccine in their home. If the individual checks this box, they will be notified that they will receive a call to schedule their vaccine appointment. A customer service representative from the California COVID-19 Vaccination Services Information Line call center will contact the individual. If the individual needs transportation and has Medi-Cal, and is enrolled in an MCP, the call center representative will schedule their vaccine appointment and connect them to their MCP for transportation coordination. If the individual is homebound and checks this box, the call center representative will provide the individual’s information to the LHD, and the LHD will then arrange for a medical team to visit the individual at home to vaccinate the individual and any family members.

MCPs should take steps to identify members who may be homebound and contact those members to determine if they have already been vaccinated against COVID-19 and, if not, whether they want to be vaccinated. For those members who have not been vaccinated and want to be, the MCP should ascertain whether the member wants an in-home vaccination. After the MCP identifies those homebound members who want an in-home vaccination, the MCP is to refer the member to the MyTurn appointment request system and instruct the member to check the box to indicate they need an

¹⁰ The CDPH COVID-19 Vaccine Allocation Guidelines can be accessed at the following link: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/VaccineAllocationGuidelines.aspx>

¹¹ The CDC and ACIP guidelines can be accessed at the following link: <https://www.cdc.gov/vaccines/hcp/acip-recs/vacc-specific/covid-19.html>.

¹² The MyTurn appointment request system can be accessed at the following link: <https://myturn.ca.gov/>

in-home vaccination. Assistance for members is also available through the California COVID-19 Hotline at 1-833-422-4255. For those members who do not want an in-home vaccination, MCPs are to assist in coordination of vaccine services and transportation, as needed.

DHCS acknowledges that arranging appointments for vaccines for homebound members via MyTurn is one resource that can be used by MCPs. MCPs can continue to coordinate vaccines for homebound members in a way that best meets the population's needs and based on existing local partnerships.

MCPs must work with Subcontractors and Network Providers to vaccinate members who are ages 12 and older. If the provider is not a vaccinators, MCPs should coordinate with Subcontractors and Network Providers to identify, prioritize, and reach out to qualified members about their vaccination eligibility to help save lives from COVID-19.

MCPs continue to be responsible for coordinating medically necessary care, including needed transportation, as well as all other requirements as mentioned above. Additionally, MCPs are encouraged to communicate to vaccine providers who are also the member's medical care provider to use the vaccination appointment as an opportunity to check in with members and take care of medical and/or preventive care issues.

MCPs are to report counts of COVID-19 vaccine-related transportation grievances through the Managed Care Operations Division's (MCO) daily COVID-19 reporting process.

Third Dose of Vaccine for Persons Considered Moderately or Severely Immunosuppressed

The Food and Drug Administration (FDA) has authorized, and the CDC recommends, that persons with certain medical conditions that suppress the immune system get a third dose of the mRNA COVID-19 vaccines (Pfizer or Moderna, whichever they initially received) at least 28 days after the second dose.¹³ This third dose can help protect individuals with weakened immune systems who may not have had a strong enough response to the first two doses of one of the mRNA vaccines.

Booster Recommendations

A booster is an additional dose of vaccine given after the protection provided by the original shot(s) has begun to decrease over time, designed to help individuals maintain

¹³ The CDC guidelines on COVID-19 vaccines for people with moderately to severely immunocompromised immune systems can be accessed at the following link: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/recommendations/immuno.html>

their immunity for longer. The FDA has authorized, and the CDC recommends, that individuals aged 65 years and older, residents in long-term care settings, and individuals aged 50–64 years with underlying medical conditions should receive a booster shot of Pfizer-BioNTech’s COVID-19 vaccine at least 6 months after completing their Pfizer-BioNTech primary series. Individuals aged 18-49 years with underlying medical conditions, and individuals aged 18-64 years who are at increased risk for COVID-19 exposure and transmission because of occupational or institutional setting, may receive a booster shot of Pfizer-BioNTech’s COVID-19 vaccine at least 6 months after their Pfizer-BioNTech primary series, based on their individual risk and benefit.^{14,15}

COVID-19 Testing Requirements for Health and Congregate Care Workers

On July 26, 2021, CDPH issued COVID-19 diagnostic testing requirements for employees in health care, long-term care, congregate living, and similar types of facilities who are not fully vaccinated against COVID-19.¹⁶

Face Covering Guidance in Response to COVID-19 Variants and Population Vaccination Rates

On July 28, 2021, CDPH issued guidance on the use of masks. The purpose of this guidance is to provide information about higher-risk settings where masks are required or recommended to prevent transmission to persons with higher-risk of infection (e.g., unvaccinated or immunocompromised persons), to persons with prolonged, cumulative exposures (e.g., workers), or to persons whose vaccination status is unknown.¹⁷

Requirements for Visitors in Acute Health Care and Long-Term Care Settings

On August 5, 2021, *and as amended on August 26, 2021*, CDPH issued a *Public Health Order* pertaining to indoor visitation at general acute care hospitals, skilled nursing facilities, intermediate care facilities, *and adult and senior care residential facilities licensed by the California Department of Social Services*. Requirements on limitation of

¹⁴ The CDC statement on booster recommendations can be accessed at the following link: <https://www.cdc.gov/media/releases/2021/p0924-booster-recommendations-.html>

¹⁵ The CDPH Pfizer COVID-19 vaccine boosters recommendations can be accessed at the following link: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Pfizer-COVID-19-Vaccine-Boosters.aspx>.

¹⁶ The CDPH State Public Health Officer Order of July 26, 2021 can be accessed at the following link: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Order-of-the-State-Public-Health-Officer-Unvaccinated-Workers-In-High-Risk-Settings.aspx>

¹⁷ The CDPH Guidance for the Use of Face Coverings can be accessed at the following link: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/guidance-for-face-coverings.aspx>

indoor visitation at these facilities is being issued in order to prevent the further spread of COVID-19.¹⁸

Health Care Worker Vaccine Requirement

On August 5, 2021 and September 9, 2021, CDPH issued a *Public Health Order* related to workers who provide services or work at specified health care facilities. By September 30, 2021, all workers, as defined, must have their first dose of a one-dose regimen or their second dose of a two-dose regimen.^{19,20}

*On September 28, 2021, CDPH issued a Public Health Order expanding the definition of a worker in adult and senior care facilities and in-home direct care settings. By November 30, 2021, all workers, as defined, must have their first dose of a one-dose regimen or their second dose of a two-dose regimen.*²¹

MCPs are responsible for ensuring that their Subcontractors and Network Providers comply with all applicable state and federal laws and regulations, contract requirements, and other DHCS guidance, including APLs and Policy Letters. These requirements must be communicated by each MCP to all Subcontractors and Network Providers.

¹⁸ The CDPH State Public Health Officer Order, Amending the Order of August 5, 2021 can be accessed at the following link: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Order-of-the-State-Public-Health-Officer-Requirements-for-Visitors-in-Acute-Health-Care-and-Long-Term-Care-Settings.aspx>.

¹⁹ The CDPH State Public Health Officer Order of August 5, 2021 can be accessed at the following link: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Order-of-the-State-Public-Health-Officer-Health-Care-Worker-Vaccine-Requirement.aspx>.

²⁰ The CDPH All Facilities Letter 21-34 can be accessed at the following link: <https://www.cdph.ca.gov/Programs/CHCQ/LCP/Pages/AFL-21-34.aspx>.

²¹ The CDPH State Public Health Officer Order of September 28, 2021 can be accessed at the following link: <https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/COVID-19/Order-of-the-State-Public-Health-Officer-Adult-Care-Facilities-and-Direct-Care-Worker-Vaccine-Requirement.aspx>.

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If you have any questions regarding this APL, please contact your MCOD Contract Manager.

Sincerely,

Original Signed by Bambi Cisneros

Bambi Cisneros, Acting Chief
Managed Care Quality and Monitoring Division