

Billing and Reimbursement for COVID-19 vaccine counseling and vaccination

Washington State
COVID-19 Vaccine Update
December 7, 2021

Agenda

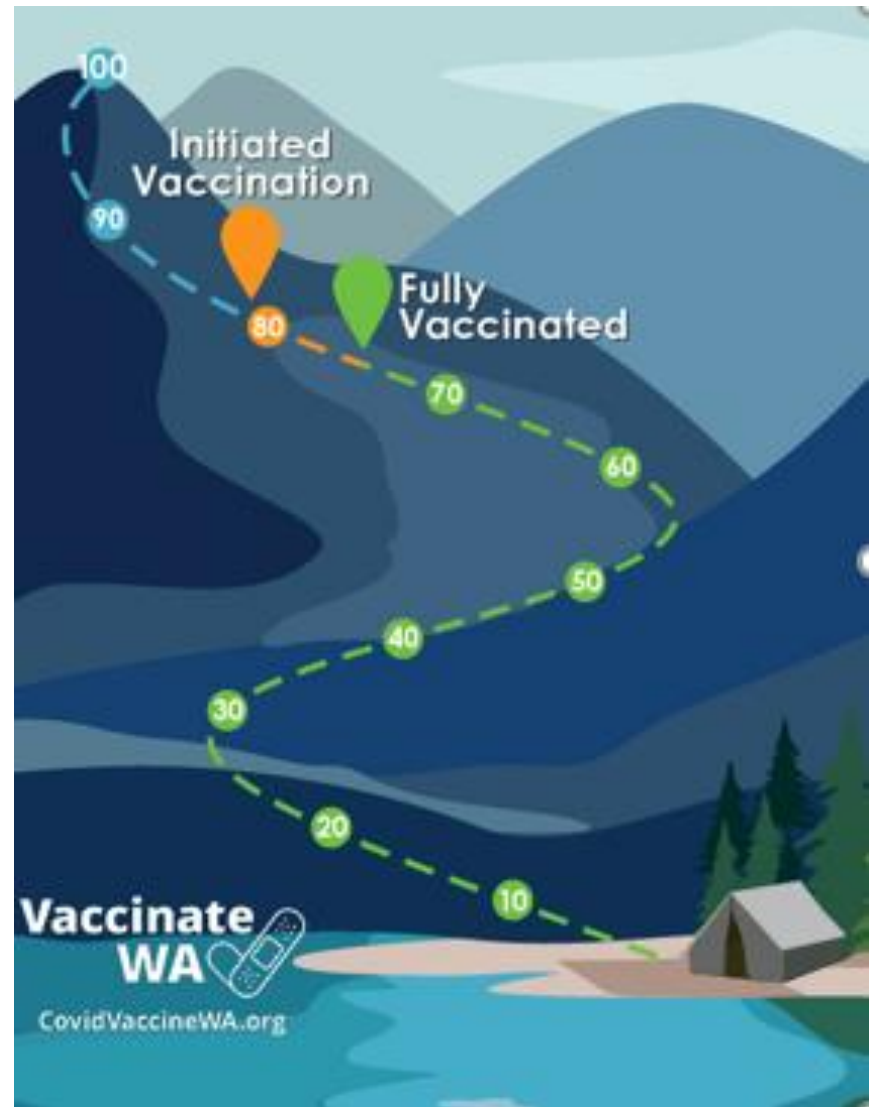
- ▶ Department of Health, Mary Huynh
 - ▶ Welcome and purpose
 - ▶ Vaccine confidence & communication resources for providers
- ▶ Office of Insurance Commissioner, Jane Beyer
 - ▶ Executive Emergency Order No. 21-02 – Providing Coverage for COVID-19 Vaccine Counseling
- ▶ Health Care Authority, Shauna Muendel
 - ▶ Billing and reimbursement – Medicaid/Apple Health implementation
 - ▶ Provider resources
 - ▶ Home administration
- ▶ Discussion/Q&A

Department of Health Vaccine Confidence and Communication



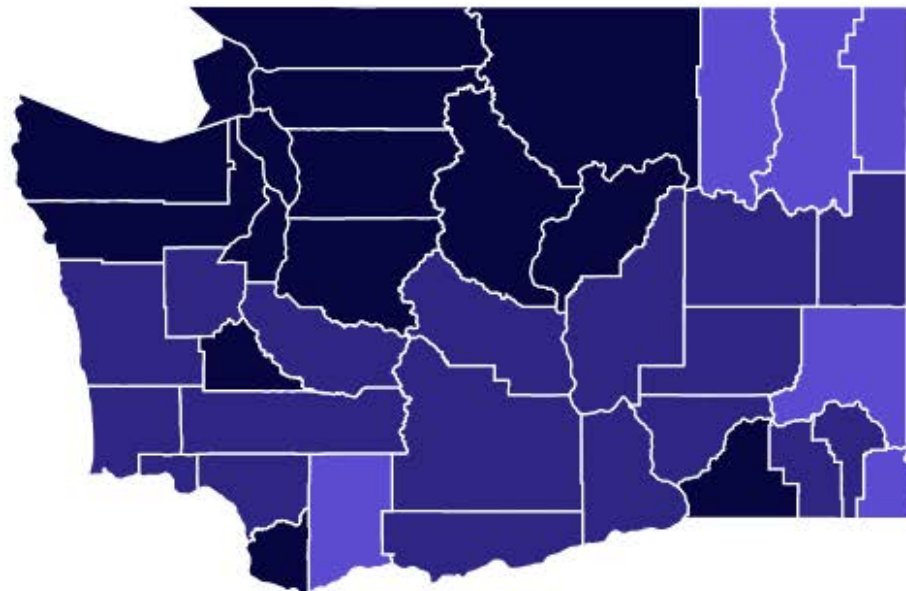
Purpose of Call

- Approaches to reaching unvaccinated individuals
 - More vaccine conversations and counseling
- Importance of trusted messengers, medical homes, and traditional vaccination locations
 - Primary care providers
- Building vaccination assessment and conversation with all patient encounters
 - Intake process
- Billing & reimbursement

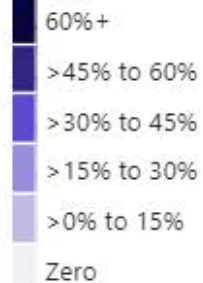


Variation in vaccination coverage

TOTAL POPULATION INITIATING VACCINATION (RECEIVING AT LEAST 1 DOSE)



Legend

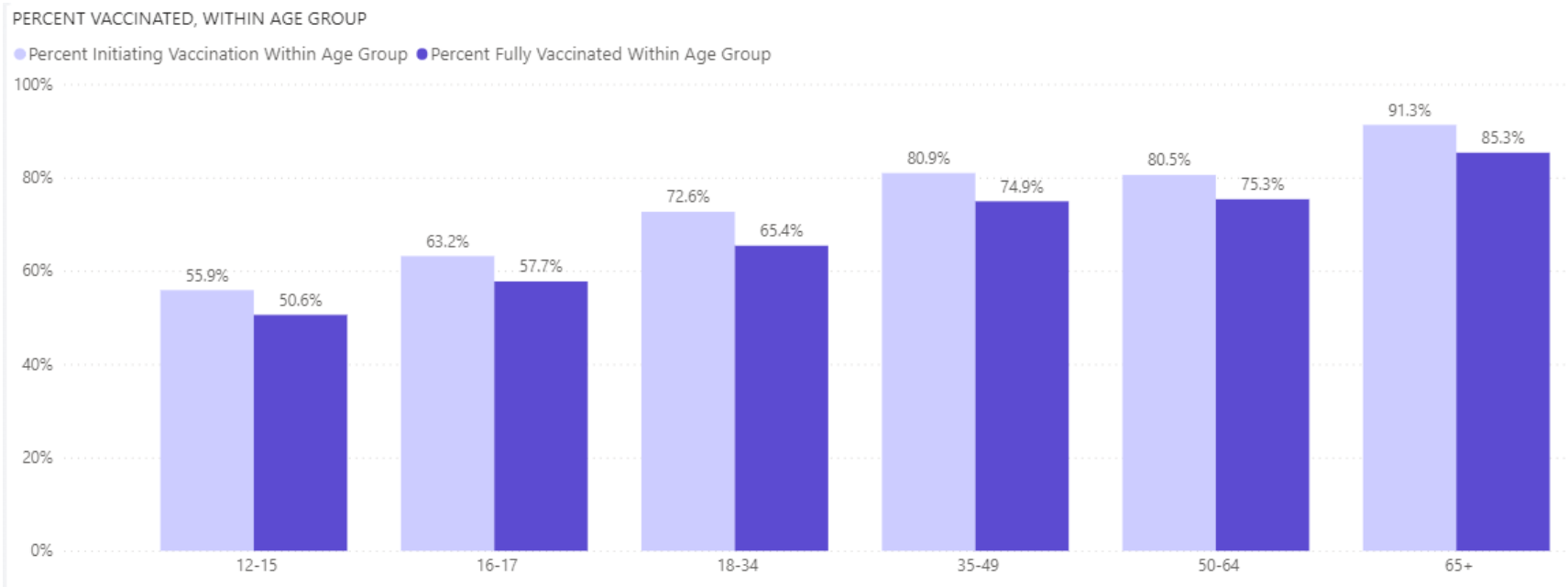


Percent of Total Population Initiating Vaccination	67.1%
Percent of Total Population Fully Vaccinated	61.9%
Percent of Population Initiating Vaccination (16+)	80.1%
Percent of Population Fully Vaccinated (16+)	73.9%
Percent of Population Initiating Vaccination (12+)	78.7%
Percent of Population Fully Vaccinated (12+)	72.5%

Source <https://www.doh.wa.gov/Emergencies/COVID19/DataDashboard> (12/4/2021)

Variation in vaccination coverage

▶ Vaccination by age group



Source <https://www.doh.wa.gov/Emergencies/COVID19/DataDashboard> (12/4/2021)

Strategy: Vaccine Conversations & Building Confidence

- **Lead with transparent, consistent, and frequent messaging.** This builds trust and credibility.
- **Translate and transcreate materials** into 36+ languages and diversify our outreach strategy. This ensures more audiences receive accurate, timely information in their preferred language and through channels they trust—which increases likelihood for behavior adoption.
- **Support community-led messaging and initiatives.** This invests in the most trusted channels and messengers, which increases trust in the message.
- **Bring community** leaders, influencers, experts, and primary audiences to the table to inform our planning process. This keeps us informed and allows us to address root causes of vaccine hesitancy.
- **Demonstrate responsiveness** to community needs and concerns. Through direct and meaningful community engagement efforts and genuine listening, a relationship of trust can be built between communities and governmental agencies.

Resources for healthcare providers

Provider toolkit



- Conversation guides
- Patient education materials
 - Talking points
- Communication toolkits
- Guidance statements

Vaccinating youth



- Educational materials
 - Clinical guides
 - Provider trainings
- Frequently asked questions

<https://www.doh.wa.gov/Emergencies/COVID19/HealthcareProviders/VaccineInformationforHealthcareProviders>



www.doh.wa.gov/pop



POP GOAL

The goal of the Power of Providers (POP) initiative is to increase COVID-19 vaccination rates in Washington State.



Seek • Ask/Educate • Vaccinate • Empower

POP OBJECTIVES

The objectives of the POP initiative are to get every provider in Washington State to:

- ▶ **SEEK:** Seek your patients' COVID-19 vaccination status.
- ▶ **ASK/EDUCATE:** If your patient isn't vaccinated, ask them about the vaccine and offer education if they're unsure.
- ▶ **VACCINATE:** If your patient agrees to vaccination, provide them with a COVID-19 vaccine or a referral to a location that provides COVID-19 vaccination.
- ▶ **EMPOWER:** Empower your patients to share their vaccination status with the community.



Vaccine Counseling Claims – Commercial Carrier Snapshot

- ▶ Ten carrier members reported total number of claims received was 1,126 - from July to October.
- ▶ Approximately 277 claims were received prior to the Emergency Order 21-02.
- ▶ Two carriers reported the number of vaccines given following consultation: small subset reported 451 consultations resulted in 71 vaccines given. Subset may not be indicative of all carriers' experience.
- ▶ Caveats – short timeframe, lag in billing, before pediatric (5-11 y.o.) recommendations
- ▶ Doesn't include E/M visits

Office of Insurance Commissioner Executive Order 21-02



Vaccine Counseling Emergency Order

- ▶ Commissioner's authority to issue emergency orders is linked to Governor's public health emergency declaration
- ▶ Duration of initial emergency order is 60 days, with authority to issue additional 30 day orders to extend
 - ▶ Applies to services provided beginning July 1, 2021
 - ▶ Most [recent extension](#) issued on December 6 is in effect until January 9, 2022.
- ▶ https://www.insurance.wa.gov/sites/default/files/documents/emergency-order-21-02_0.pdf

Vaccine Counseling Emergency Order

▶ Conditions for coverage:

- ▶ Consultation is by an in-network medical provider (does not include pharmacy services providers)
- ▶ Provider checks patient's vaccination status and asks patient to confirm patient isn't already vaccinated. Provider has established relationship with patient
- ▶ Provider/patient discussion is contemporaneous, either in-person or via voice. If audio-only, patient must consent to health plan being billed for the service
- ▶ Cap of two billings per patient
- ▶ Bill using diagnosis code Z71.89 and CPT code 99401, 99441 or 98966

Vaccine Counseling Emergency Order

- ▶ COVID-19 vaccine counseling covered as a “preventive service”, i.e. no patient cost-sharing
- ▶ Carrier cannot deny a claim after the fact based upon carrier’s knowledge of a patient’s vaccination status.
- ▶ Carrier is not required to include payment for a facility fee associated with a provider-based clinic, as defined in RCW 70.01.040.

Health Care Authority Medicaid Reimbursement for COVID-19 Vaccine Counseling



COVID Vaccine Counseling Billing

- ▶ **Providers** who counsel patients about COVID-19 vaccine information and availability can bill using the codes below:
 - ▶ Established patient office visit series: 99211 - 99215
 - ▶ Preventive medicine counseling, approx. 15 minutes: 99401(new as of 12/3/21)
 - ▶ Telephone evaluation codes: 99441 - 99443
 - ▶ In the scenario the provider is already seeing the patient for another reason, and counseling for COVID-19 vaccination increases the time spent with the patient, the provider may account for this additional time by choosing the appropriate E/M level

- ▶ **Nurses and medical assistants** who counsel patients about COVID-19 vaccine information and availability can bill using CPT® code 99211

Policy retroactive to dates of service beginning on 6/22/21

COVID Vaccine Counseling Billing

- ▶ The claim must include the **ICD-10 diagnosis code Z71.89** (other specified counseling) in the primary position
- ▶ All claims using ICD-10 diagnosis code Z71.89 require the **CR modifier**
- ▶ Telehealth:
 - ▶ Use **POS 02** for **audio-visual visits** (**POS 10** for when patient is at home starting January 1, 2022)
 - ▶ Use **-CR modifier** to denote when service provided over the **phone/audio-only** (**-FQ modifier** starting January 1, 2022)
- ▶ If the patient receives the vaccine in-office after a counseling visit, use the appropriate CPT codes for **Vaccine Administration** which may be billed the same date of service

COVID Vaccine Counseling Billing

- ▶ Patient should be established with provider (at least 1 in-person appointment in the last 3 years)
- ▶ Counseling efforts should be focused on patients who are unvaccinated or partially vaccinated
- ▶ Providers performing Counseling Visits should be prepared to provide vaccine or be able to refer to accessible vaccine sites

COVID Vaccine Administration Billing

COVID Vaccine and Vaccine Administration

CPT® or HCPCS	Short Description	Labeler	Vaccine/Procedure Name
91300	SARSCOV2 VAC 30MCG/0.3ML IM	Pfizer	Pfizer-BioNTech Covid-19 Vaccine
0001A	ADM SARSCOV2 30MCG/0.3ML 1 ST	Pfizer	Pfizer Covid-19 Vaccine Admin – 1 st Dose
0002A	ADM SARSCOV2 30MCG/0.3ML 2 ND	Pfizer	Pfizer Covid-19 Vaccine Admin – 2 nd Dose
0003A	ADM SARSCOV2 30MCG/0.3ML 3 RD	Pfizer	Pfizer Covid-19 Vaccine Admin – 3 rd Dose
0004A	ADM SARSCOV2 30MCG/0.3ML BST	Pfizer	Pfizer Covid-19 Vaccine Admin – Booster
91307	SARSCOV2 VAC 10 MCG TRS-SUCR	Pfizer	Pfizer-BioNTech Covid-19 Pediatric Vaccine
0071A	ADM SARSCV2 10MCG TRS-SUCR 1	Pfizer	Pfizer Covid-19 Ped Vaccine Admin- 1 st Dose
0072A	ADM SARSCV2 10MCG TRS-SUCR 2	Pfizer	Pfizer Covid-19 Ped Vaccine Admin- 2 nd Dose
91301	SARSCOV2 VAC 100MCG/0.5ML IM	Moderna	Moderna Covid-19 Vaccine
0011A	ADM SARSCOV2 100MCG/0.5ML1ST	Moderna	Moderna Covid-19 Vaccine Admin– 1 st Dose
0012A	ADM SARSCOV 100MCG/0.5ML2ND	Moderna	Moderna Covid-19 Vaccine Admin- 2 nd Dose
0013A	ADM SARSCOV2 100MCG/0.5ML3RD	Moderna	Moderna Covid-19 Vaccine Admin– 3 rd Dose
91306	SARSCOV2 VAC 50MCG/0.25ML IM	Moderna	Moderna Covid-19 Vaccine Booster Low Dose
0064A	ADM SARSCOV2 50MCG/0.25MLBST	Moderna	Moderna Covid-19 Vaccine Admin- Booster
91303	SARSCOV2 VAC AD26 .5ML IM	Janssen	Janssen Covid-19 Vaccine
0031A	ADM SARSCOV2 VAC AD26 .5ML	Janssen	Janssen Covid-19 Vaccine Admin- 1 st Dose
0034A	ADM SARSCOV2 VAC AD26 .5ML B	Janssen	Janssen Covid-19 Vaccine Admin- Booster

COVID Vaccine Administration for Homebound clients

- ▶ Use CPT Code **M0201** for **COVID-19 vaccine home administration**
- ▶ Medicaid policy aligns with Medicare criteria
 - ▶ The patient has a condition that makes them more susceptible to contracting COVID-19.
 - ▶ The patient is generally unable to leave the home, and if they do leave home, it requires a considerable effort.
 - ▶ The patient has a disability or faces clinical, socioeconomic, or geographical barriers
 - ▶ The patient faces challenges with transportation, communication, or caregiving.

Pharmacies – Billing for COVID vaccines administered in the home setting

Billing HCA-contracted MCOs

- ▶ Claims may be billed through the pharmacy point-of-sale (POS) system using the following guidance
 - ▶ **01=Home** is entered into the patient residence (**field 384-4X**)
 - ▶ The **fee for vaccine administration** is entered into the incentive amount submitted (**field 438-E3**).

Billing HCA Fee-for-Service

- ▶ Pharmacies billing HCA fee-for-service must bill COVID vaccine administration on a professional claim (HIPPA 837 transaction)
 - ▶ **Use CPT code M0201**, taxonomy 193200000X and follow the Medicaid policy.

Discussion/Q&A

Discussion

- ▶ In general, how is COVID-19 vaccination billing and reimbursement working for you?
- ▶ Have you billed for preventative counseling for COVID-19? What was your experience?
- ▶ What concerns do you have or are you hearing about?
- ▶ What do you think the state should be thinking about regarding communications?
- ▶ Are there opportunities for further collaboration?

Resources


- ▶ Executive Emergency Order 21-02 – Health Plans must cover COVID-19 vaccine consultation (renewed)
- ▶ Health Care Authority – reimbursement policies for Medicaid/Apple Health/PEBB
- ▶ COVID Vaccine webpage:
<https://www.doh.wa.gov/Emergencies/COVID19/Vaccine>
- ▶ COVID Vaccine email: COVID.Vaccine@doh.wa.gov
- ▶ Provider Resource Page (Enrollment & Toolkit)
 - ▶ <https://www.doh.wa.gov/Emergencies/COVID19/HealthcareProviders/VaccineInformationforHealthcareProviders>
- ▶ Provider Issues and Complaints
 - ▶ <https://www.doh.wa.gov/AboutUs/Fileacomplaint>
 - ▶ <https://www.insurance.wa.gov/covid-19-vaccines>


DOH COVID-19 Vaccine Newsletter


- The COVID-19 Vaccine Newsletter is a topic people can subscribe to on GovDelivery.
- People can manage their subscriptions by going to the following [link](#).
 - From there, click on 'add subscriptions' at the bottom of the page.


Add Subscriptions

- On the next page, expand the 'Immunizations' tab and check the box for "COVID-19 Vaccine Partner Newsletter."

☰ Immunization 

School Nurses and Immunizations 

Childcare and Preschool Staff and Immunizations List 

COVID-19 Vaccine Partner Newsletter 

COVID-19 Vaccination Billing and Reimbursement

As a condition of participation in the WA COVID-19 vaccination program, providers must administer COVID-19 vaccine regardless of the vaccine recipient’s ability to pay COVID-19 vaccine administration fees.¹
All insurers are required to provide coverage of the vaccine without cost-sharing.

	Provider enrollment	Coding/Billing	Reimbursement
Medicare	<ul style="list-style-type: none"> Either enroll with Medicare (regional MAC) as a provider, or as a mass immunizer 	<ul style="list-style-type: none"> CMS guidance Usual billing methodologies, or roster billing 	\$40.00 for the first, second, and booster/additional doses
Medicaid	<ul style="list-style-type: none"> Providers must be enrolled in Medicaid (federal requirement). Streamlined enrollment for Medicare enrolled mass immunizers 	<ul style="list-style-type: none"> WA Medicaid COVID-19 Vaccine policy Usual billing methodologies, or template billing 	Medicare rates
Commercial	<ul style="list-style-type: none"> Per individual health plan 	<ul style="list-style-type: none"> Per individual health plan 	Negotiated rate
Uninsured (HRSA Portal)	<ul style="list-style-type: none"> Complete provider roster form on HRSA website 	<ul style="list-style-type: none"> Bill on HIPAA 837 transaction via HRSA portal 	Medicare rates

¹ https://www.doh.wa.gov/Portals/1/Documents/1600/coronavirus/PreparingEnrollment_COVID19VaccineProvider.pdf

Vaccine Administration Fees

- ▶ **must** administer COVID-19 Vaccine at no out-of-pocket cost to the recipient
- ▶ may **not** deny anyone vaccination based on the vaccine recipient's coverage status or network status
- ▶ may **not** charge an office visit or other fee if COVID-19 vaccination is the sole medical service provided
- ▶ may **not** require additional medical services to receive COVID-19 vaccination
- ▶ **may** seek appropriate reimbursement from a program or plan that covers COVID-19 Vaccine administration fees for the vaccine recipient, such as:
 - ▶ vaccine recipient's private insurance company
 - ▶ Medicare or Medicaid reimbursement
 - ▶ HRSA COVID-19 Uninsured Program for non-insured vaccine recipients
- ▶ may **not** seek any reimbursement, including through balance billing, from the vaccine recipient

**Thank you for joining and for your
important work**



Additional Slides

Health Promotion and Education

▶ COVID-19 vaccine for ages 5-11

- New: Toolkit to help schools host a vaccine clinic
- Ongoing: Social media to educate parents
- New video: Misinformation/disinformation

▶ Blog topics (medium.com/wadepthealth)

- WVerify
- Vaccination for kids (5-11)
- Before your child's vaccine checklist (Spanish only)

▶ Pending translations

- VaccinateWA.org/kids in 40 languages
- Several documents in large print and in Braille