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November 16, 2020

Statewide Medicaid Managed Care (SMMC) Policy Transmittal: 2020-60

Applicable to the **2018-2023 SMMC contract benefits** for:

- Managed Medical Assistance (MMA) and MMA Specialty
- Long-Term Care (LTC)
- Dental

Re: Public Readiness and Emergency Preparedness Act (PREP Act)

The managed care plan must provide immunizations in accordance with the Recommended Childhood and Adolescent Immunization Schedule for the United States, or when medically necessary for the enrollee's health. (Attachment II, Exhibit II-A, Section VI.A.1.a.10.a.) In response to a decrease in childhood vaccination rates caused by the COVID-19 pandemic, the U.S. Department of Health and Human Services issued a third amendment to the Public Readiness and Emergency Preparedness Act (PREP Act) to counterbalance potential decreases in rates of routine childhood vaccinations due to changes in healthcare access, social distancing, and other COVID-19 mitigation strategies. (See [85 FR 15198, March 17, 2020](#).) The provisions of this Act became law on August 24, 2020. In addition, the Florida Legislature expanded the scope of practice for pharmacists during the 2020 Legislative Session. (See Chapter No. [2020-7](#) of the Laws of Florida.) The purpose of this policy transmittal is to notify the managed care plan of new requirements related to a newly qualified provider for the coverage and administration of vaccines as a result of the PREP Act and s. 465.1895, Florida Statutes.

Provider Eligibility

This recent amendment to the PREP Act authorized State-licensed pharmacists (and pharmacy interns acting under their supervision to administer vaccines, if the pharmacy intern is licensed or registered by his or her State board of pharmacy) to order and administer vaccines to individuals ages three (3) through 18 years. This authorization is subject to specific vaccine product, training, certification, and reporting requirements, despite any State or local scope-of-practice legal requirements.

The PREP Act authorizes pharmacy providers to enroll in the Vaccines for Children (VFC) program, and the managed care plan must require qualified pharmacists and pharmacy interns who wish to provide immunizations to enroll in the VFC program. To enroll in the VFC program, pharmacy providers must follow these three steps:

- The pharmacy provider must email FloridaVFC@FLHealth.gov or call at 1-877-888-7468 for enrollment information.
- The pharmacy provider will receive an email from a Florida VFC program representative, which will provide the VFC Provider Agreement and Provider Patient Profile form.



- The pharmacy provider must complete and return the VFC Provider Agreement and Provider Patient Profile form to FloridaVFC@FLHealth.gov.

The Florida VFC program begins the provider enrollment eligibility verification process upon receipt of the provider's completed enrollment forms. The managed care plan and its providers may find more information about the Florida VFC program, including the [VFC Program Provider Guidelines](#), [VFC Frequently Ask Questions](#), [Ordering VFC Program Vaccines](#), [VFC Forms and Records](#), and the [VFC Program Provider Handbook](#), online at <http://www.floridahealth.gov/programs-and-services/immunization/vaccines-for-children/index.html>.

The managed care plan must notify its participating pharmacies about the VFC program by November 30, 2020.

Enrollee Eligibility

The recent amendment to the PREP Act authorizes the administration of vaccines by eligible pharmacy providers to enrollees ages three (3) through 18 years.

Vaccine Coverage

With the exception of MediKids enrollees, all other enrollees ages birth (0) through eighteen (18) years are eligible to participate in the VFC program. Enrolled VFC program providers may order vaccines through the VFC program and receive routine vaccines at no cost. The VFC program provides vaccines at no cost to eligible children ages birth (0) through eighteen (18) years, who might not otherwise have been vaccinated due to their parent's/guardian's inability to pay.

MediKids enrollees are not eligible to participate in the VFC program. The managed care plan is responsible for the coverage of administration and vaccines to MediKids enrollees.

For a list of the applicable vaccines to be administered by providers authorized under the PREP Act, please see the attachment to this policy transmittal.

Provider Reimbursement for Vaccines and Administration

The managed care plan is responsible for reimbursement of administration fees for vaccines provided by pharmacy providers to its Medicaid enrollees, and the administration fees and vaccine product costs for its MediKids enrollees. As MediKids enrollees are not eligible for participation in the VFC program, the managed care plan must establish mutually acceptable rates of payment with pharmacy providers for vaccine products provided to MediKids enrollees¹.

The Agency recognizes the managed care plan may rely upon the Agency's fee-for-service fee schedules and/or reimbursement methodologies in its provider agreements, and therefore this

¹ Prior to 2019, Florida Medicaid providers were reimbursed a MediKids-specific rate from the promulgated Immunization Fee Schedule, Rule 59G-4.002, Florida Administrative Code. The Agency used the Private Sector Cost/Dose from the most recent version of the [CDC's Pediatric/VFC Vaccine Price List](#). Although the CDC Pediatric/VFC Vaccine Price List Private Sector Cost/Dose is updated throughout the year, the Agency rates were typically established using the cost/dose as of the November immediately preceding the new Agency fee schedule.

policy transmittal provides the following reference information on provider reimbursement for vaccines and administration fees. The Medicaid fee-for-service reimbursement system will reimburse no more than \$8 for administration of vaccines at point-of-sale when provided by a pharmacy provider (i.e., 80% of the \$10 physician fee for administration). These provisions apply only to children three (3) through 18 years of age. Administration and cost of vaccines for enrollees 19 through 20 years of age continues according to the fee-for-service Prescribed Drugs Immunization Fee Schedule (Rule 59G-4.002, Florida Administrative Code). The Agency will not reimburse pharmacy providers for a dispensing fee for vaccinations.

It is the intent of the Act that pharmacy providers have the ability to enroll in the Medicaid program (and the managed care plan's network) to receive direct reimbursement for the provision of immunization services. The managed care plan must program its billing systems to accept claims and make payments to pharmacists for vaccinations in accordance with this policy transmittal by November 30, 2020.

It is noteworthy that ***this additional provider qualification does not expand covered services or expand eligibility to receive services.*** The contract currently obligates the managed care plan to cover immunizations for eligible enrollees, and this coverage is included in the capitation rates. The managed care plan will not receive reimbursement for the provision of vaccine products that are already covered by the VFC program, and the Agency will not include such encounters in capitation rate development. This policy transmittal continues to require the managed care plan to administer vaccines as recommended by the Advisory Committee on Immunization Practices to enrollees ages three through 18 years.

If you have questions or concerns, please contact your contract manager.

Sincerely,



Beth Kidder
Deputy Secretary for Medicaid

BK/sar

Attachment: List of Billable NDCs for the Plans - PREP Act - 3-18 Years