

## Federal Requirements of the VFC Program

1. Providers must comply with the immunization schedule, dosage, and contraindications established by the Department of Health and Human Services (DHHS) and ACIP unless:  
(a) a physician, when making a medical judgment in conformance with accepted medical practice, deems compliance to be medically inappropriate; or (b) a particular requirement is not in compliance with state law, including state laws relating to religious beliefs or other exemptions. The ACIP immunization schedule is compatible with recommendations of both the American Academy of Pediatrics (AAP) and the American Academy of Family Physicians (AAFP).
2. Vaccine Information Statements (VISs) must be provided to patients/parents/guardians at each visit and must be maintained in accordance with the *National Childhood Vaccine Injury Act (NCVIA)*.
3. A charge shall not be imposed for the cost of vaccine purchased with federal funding. Charging a fee for VFC vaccine is considered to be a fraudulent activity.
4. The administration of a federally procured vaccine shall not be denied due to the inability of the child's parent/guardian/individual of record to pay an administration fee.
5. VFC vaccine shall be administered to children through 18 years of age who meet at least one of the following criteria:
  - Medicaid – eligible or Medicaid enrolled
  - Uninsured
  - American Indian or Alaska Native
  - Underinsured (has insurance, but the insurance does not include vaccines or does not cover all ACIP recommended vaccines)

If private stock vaccine is used to vaccinate a child that is VFC-eligible, it is acceptable to replace a private stock vaccine dose with a VFC dose. If private stock vaccine is unavailable, and an insured child will not otherwise be vaccinated, it is acceptable to vaccinate the child with VFC vaccine as long as the dose is replaced with a private stock vaccine dose as soon as the provider's private stock vaccine arrives. Borrowing of VFC vaccine for use with private pay patients must occur only under exceptional circumstances. All borrowing must be replaced within 90 days – or as soon as private stock is available.

Borrowing and replacement of vaccine must be documented in the MCIR Vaccine Inventory Module (VIM). **VFC flu vaccine is an exception to the borrowing rule – VFC flu vaccine cannot be used on private pay patients under any circumstances.**

6. Physicians shall maintain records of the authorized representative's responses concerning a child's VFC eligibility for a **minimum period of three years**. Release of patient records is governed by the privacy protections set forth in Federal Medicaid law. A provider shall make such records available to a local or state health department or DHHS when requested.
7. Vaccine administration fees for a VFC-eligible child shall not exceed the maximum fee of \$23.03 per injection established by the DHHS.
8. Vaccine Manager and Back-up Manager must receive (and have documentation of) annual training on VFC Program requirements and vaccine storage and handling.

