

Bulletin Number: MMP 23-26

Distribution: Federally Qualified Health Centers (FQHCs), Rural Health Clinics (RHCs), Tribal Health Centers (THCs), Tribal FQHCs, Medicaid Health Plans (MHPs), Integrated Care Organizations (ICOs)

Issued: April 7, 2023

Subject: Temporary Extension to the Disaster Relief Policies for COVID-19 Public Health Emergency (PHE) Specific to Clinic Vaccine Administration Payments

Effective: As Indicated

Programs Affected: Medicaid, Healthy Michigan Plan, MICHild, Maternity Outpatient Medical Services (MOMs), Emergency Services Only (ESO), MI Health Link

General Information

This bulletin notifies Michigan Medicaid-enrolled FQHCs, RHCs, Tribal FQHCs, and THCs of information regarding the temporary extension of Medicaid program reimbursement of COVID-19 vaccine administration services post- PHE.

Consistent with the PHE conditions related to COVID-19, the Michigan Department of Health and Human Services (MDHHS) issued several bulletins and letters, including MSA 20-75, MSA 21-42, and L 22-04 addressing clinic stand-alone COVID-19 vaccine administration coverage and reimbursement. This policy also reminds clinics of COVID-19 vaccine administration reimbursement and clarifies that payments will temporarily continue post-PHE.

Effective May 12, 2023, and ending September 30, 2024, FQHCs, RHCs, Tribal FQHCs, and THCs will be reimbursed for COVID-19 vaccine administration services when no other eligible qualifying clinic visit is provided on the same date of service.

FQHC, RHC, and Tribal FQHC Reimbursement Requirements

Payment for stand-alone COVID-19 vaccine administration in FQHCs, RHCs, and Tribal FQHCs will be made through an alternative payment methodology (APM). The APM provides reimbursement for stand-alone COVID-19 vaccine administration services using a cost-based rate. The APM is intended to be time-limited and is a temporary extension to previously approved Disaster Relief policies and will expire September 30, 2024.

FQHCs, RHCs, and Tribal FQHCs must explicitly agree to accept the APM for COVID-19 vaccine administration reimbursement. Health centers will be contacted via written communication requesting an e-mail response affirmatively accepting the APM. Clinics that fail to respond in agreement of the APM will be excluded from the APM and have COVID-19

vaccine administration services reimbursed as part of the prospective payment system (PPS) methodology. Clinics accepting the APM will be reimbursed for stand-alone COVID-19 administration services at the cost-based rate, and the payment will be excluded from the PPS methodology for FQHCs, RHCs, and Tribal FQHCs. **NOTE:** this is considered a new APM separate from the previous agreement effective through the end of the PHE. New written communication from MDHHS will be issued and an e-mail response affirmatively accepting this APM is required for reimbursement post-PHE.

THC Reimbursement Requirements

Payment for stand-alone COVID-19 vaccine administration at THCs is made through a payment rate increase. Therefore, THCs will not be required to respond to MDHHS to receive the cost-based payment rate for stand-alone COVID-19 vaccine administration services. Tribal FQHCs are still required to respond in agreement of the APM to receive cost-based reimbursement. The payment rate increase is intended to be time-limited and is a temporary extension to previously approved Disaster Relief policies and will expire September 30, 2024.

Clinic Cost Reconciliation

The initial fee-for-service and MHP reimbursement for stand-alone COVID-19 vaccine administration services will be at 100 percent of Medicare rates. Annual cost reconciliation will occur to reimburse eligible clinics the difference between the Medicare rate and the cost-based rate. Reconciliation will occur in the form of a lump-sum gross adjustment. All reimbursement rates will be reviewed and updated as applicable and are published on the MDHHS website at www.michigan.gov/medicaidproviders >> Billing & Reimbursement >> Provider Specific Information. All other COVID-19 vaccine coverage information described in Bulletin MSA 20-75, MSA 21-42, and L 22-04 remains unchanged.

Public Comment

The public comment portion of the policy promulgation process is being conducted concurrently with the implementation of the change noted in this bulletin. Any interested party wishing to comment on the change may do so by submitting comments to Tyler Wise at WiseT2@michigan.gov.

Please include “Temporary Extension to the Disaster Relief Policies for COVID-19 PHE Specific to Clinic Vaccine Administration Payments” in the subject line.

Comments received will be considered for revisions to the change implemented by this bulletin.

Manual Maintenance

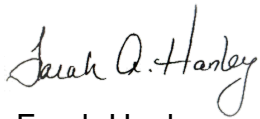
Information is time-limited and will not be incorporated into any policy or procedure manuals.

Questions

Any questions regarding this bulletin should be directed to Provider Inquiry, Department of Health and Human Services, P.O. Box 30731, Lansing, Michigan 48909-8231, or e-mailed to ProviderSupport@michigan.gov. When you submit an e-mail, be sure to include your name, affiliation, NPI number, and phone number so you may be contacted if necessary. Typical Providers may phone toll-free 800-292-2550. Atypical Providers may phone toll-free 800-979-4662.

An electronic copy of this document is available at www.michigan.gov/medicaidproviders >> Policy, Letters & Forms.

Approved



Farah Hanley
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