

MICHIGAN DEPARTMENT OF HEALTH AND HUMAN SERVICES

NOTICE OF PROPOSED POLICY

Public Act 280 of 1939, as amended, and consultation guidelines for Medicaid policy provide an opportunity to review proposed changes in Medicaid policies and procedures.

Please review the policy summary and the attached materials that describe the specific changes being proposed. Let us know why you support the change or oppose the change.

Submit your comments to the analyst by the due date specified. Your comments must be received by the due date to be considered for the final policy bulletin.

Thank you for participating in the consultation process.



Director, Program Policy Division
Bureau of Medicaid Policy, Operations, and Actuarial Services

Project Number: 2226-EPSDT **Comments Due:** October 3, 2022 **Proposed Effective Date:** December 1, 2022

Mail Comments to: Matt Hambleton

Telephone Number: 517-284-1209 **Fax Number:**
E-mail Address: hambletonm@michigan.gov

Policy Subject: Clarification of Stand-alone COVID-19 Vaccine Counseling

Affected Programs: Medicaid, Healthy Michigan Plan, MICHild, Maternity Outpatient Medical Services (MOMS), MI Health Link

Distribution: Practitioners, Local Health Departments, Federally Qualified Health Centers, Rural Health Clinics, Medicaid Health Plans, Tribal Health Centers

Policy Summary: The Michigan Department of Health and Human Services (MDHHS) covers COVID-19 vaccine stand-alone counseling without beneficiary cost sharing in accordance with Section 9811 of the American Rescue Plan Act of 2021 (ARP) for beneficiaries under 21 years of age for both the Early and Periodic Screening, Diagnosis, and Treatment (EPSDT) services benefit and the COVID-19 vaccination coverage required under the ARP. This policy updates the previous guidance of letter L 22-04 that was issued on March 1, 2022.

Purpose: This bulletin is being issued to support statewide efforts in the administration of Advisory Committee on Immunization Practices (ACIP) recommended vaccines.

Proposed Policy Draft

Michigan Department of Health and Human Services
Behavioral & Physical Health and Aging Services Administration

Distribution: Practitioners, Local Health Departments, Federally Qualified Health Centers, Rural Health Clinics, Medicaid Health Plans, Tribal Health Centers

Issued: November 1, 2022 (Proposed)

Subject: Clarification of Stand-alone COVID-19 Vaccine Counseling

Effective: December 1, 2022 (Proposed)

Programs Affected: Medicaid, Healthy Michigan Plan, MIChild, Maternity Outpatient Medical Services (MOMS), MI Health Link

The Michigan Department of Health and Human Services (MDHHS) strongly encourages providers to offer Advisory Committee on Immunization Practices (ACIP) recommended vaccines for all adults, adolescents, and children at every visit. Vaccine counseling has been shown to help address vaccine hesitancy by helping beneficiaries and their families learn about vaccines from trusted health care providers.

Medicaid covers vaccine counseling services for all children under 21 years of age under the Early and Periodic Screening, Diagnosis, and Treatment (EPSDT) benefit. Additionally, vaccine counseling services are covered for adults as part of the preventive services benefit. Under these benefits, the Medicaid program also covers and reimburses for stand-alone vaccine counseling services. Stand-alone vaccine counseling refers to when a patient and/or caregiver receives counseling about a vaccine from a health care practitioner, but the patient does not actually receive the vaccine on the same date of service as the counseling. Vaccine counseling services are not subject to beneficiary cost-sharing.

To facilitate reporting of vaccine counseling services, providers should report one of the following new Healthcare Common Procedure Coding System (HCPCS) or Current Procedural Terminology (CPT) codes beginning with dates of service on or after December 1, 2022:

Adult Stand-Alone Vaccine Counseling

G0310 - Immunization counseling by a physician or other qualified healthcare professional when the vaccine(s) is not administered on the same date of service, 5 to 15 minutes time. (This code is used for Medicaid billing purposes.)

G0311 - Immunization counseling by a physician or other qualified healthcare professional when the vaccine(s) is not administered on the same date of service, 16-30 minutes time. (This code is used for Medicaid billing purposes.)

Child / Early and Periodic Screening, Diagnosis, and Treatment (EPSDT) Benefit

90460 - Immunization administration through 18 years of age via any route of administration, with counseling by physician or other qualified healthcare professional (QHP), first or only component of each vaccine or toxoid administered.

90461 - Immunization administration through 18 years of age via any route of administration, with counseling by physician or other QHP, each additional vaccine or toxoid component administered.

G0312 - Immunization counseling by a physician or other qualified healthcare professional when the vaccine(s) is not administered on the same date of service for ages under 21, 5 to 15 minutes time. (This code is used for Medicaid billing purposes.)

G0313 - Immunization counseling by a physician or other qualified healthcare professional when the vaccine(s) is not administered on the same date of service for ages under 21, 16-30 minutes time. (This code is used for Medicaid billing purposes.)

COVID-19 Child / EPSDT Stand-Alone Vaccine Counseling

MDHHS covers stand-alone COVID-19 vaccine counseling without beneficiary cost sharing in accordance with Section 9811 of the American Rescue Plan Act of 2021 (ARP) for beneficiaries under 21 years of age for both the EPSDT services benefit and the COVID-19 vaccination coverage required under the ARP. Covered HCPCS codes include:

G0314 - Immunization counseling by a physician or other qualified healthcare professional for COVID-19, ages under 21, 16-30 minutes time. (This code is used for the Medicaid EPSDT benefit.)

G0315 - Immunization counseling by a physician or other qualified healthcare professional for COVID-19, ages under 21, 5-15 minutes time. (This code is used for the Medicaid EPSDT benefit.)

The administration of a COVID-19 vaccine includes COVID-19 vaccine counseling. Administration services and COVID-19 vaccine counseling services provided on the same date of service will not be separately reimbursed.

Previous guidance, per [Letter L 22-04](#) that was issued on March 1, 2022, indicated that for stand-alone COVID-19 vaccine counseling services, non-pharmacy providers may submit claims for reimbursement by identifying the service with the appropriate CPT code such as 99401, 99402, 99403, or 99404, as appropriate, in compliance with coding guidelines. Due to updated guidance from the Centers for Medicare & Medicaid Services (CMS), providers should

discontinue the use of these CPT codes and begin using HCPCS codes G0314 and/or G0315 for the stand-alone COVID-19 vaccine counseling services that are provided to beneficiaries eligible for the EPSDT services benefit. Pharmacy providers should continue to bill vaccine counseling as a Medication Therapy Management (MTM) service when billed in accordance with the MTM policy. Documentation must support the service provided.

Provider Resources

For more information regarding the coverage of stand-alone COVID-19 vaccine counseling, refer to the CMS letter of guidance to the states: <https://www.medicaid.gov/federal-policy-guidance/downloads/sho22002.pdf>