

**Bulletin Number:** MSA 15-08

**Distribution:** Pharmacy Providers, Federally Qualified Health Centers (FQHCs)

**Issued:** May 1, 2015

**Subject:** Expansion of Coverage for Pharmacy Administration of Vaccines

**Effective:** June 1, 2015

**Programs Affected:** Medicaid, Healthy Michigan Plan, Maternity Outpatient Medical Services (MOMS)

**NOTE: Implementation of this policy is dependent upon approval of a State Plan Amendment by the Centers for Medicare & Medicaid Services (CMS).**

The purpose of this policy is to announce that effective June 1, 2015, participating pharmacies may administer all vaccines recommended by the Advisory Committee for Immunization Practices (ACIP) to adult beneficiaries ages 19 and older. In addition, certain pharmacies that have been selected by the Michigan Department of Health and Human Services (MDHHS) to participate in the Vaccines for Children (VFC) program may administer recommended vaccines to adolescent beneficiaries 11 through 18 years of age.

**For beneficiaries enrolled in a Medicaid Health Plan (MHP) the pharmacy provider must confirm coverage of pharmacist-administered vaccines with the MHP.**

Pharmacists who are interested in administering vaccines to beneficiaries under this policy must complete live in-person training for vaccine administration. Training may be provided by a healthcare employer, a professional association, a public health government entity, or other sources. The training must at a minimum follow the vaccine administration guidelines as issued by the Centers for Disease Control and Prevention (CDC).

A separate training is recommended for staff responsible for storing and handling vaccines.

Pharmacists must be in compliance with State of Michigan rules and regulations, have completed training for vaccine administration, and have a letter of delegation from a physician to be eligible to administer vaccines under this policy. This documentation must be readily available onsite in the event of an audit. The pharmacy must develop an appropriate mechanism to document the identification of the administering pharmacist.

Pharmacists who administer vaccines must register with the Michigan Care Improvement Registry (MCIR). This database provides a complete record of immunizations for Michigan residents. Pharmacists must review the beneficiary's immunization history in MCIR prior to administering the vaccine. MCIR must be updated within 72 hours of administering the vaccine. More information on MCIR is available at [www.mcir.org](http://www.mcir.org).

To receive reimbursement, pharmacies must be Medicaid-enrolled and submit claims through MDHHS's contracted Pharmacy Benefits Manager (PBM) in accordance with relevant policy and claim processing manual instructions. Vaccines are exempt from copayments. Dispensing fees are not paid on claims for vaccines. Vaccines administered for travel to a foreign country are not a Medicaid-covered benefit.

### **Pharmacies Administering Vaccines to Adult Beneficiaries**

Vaccines administered by eligible pharmacists will be covered for adults aged 19 years and over when given according to the Advisory Committee on Immunization Practices (ACIP) recommendations. Coverage of pharmacist-administered vaccines will no longer be limited to seasonal influenza and H1N1 vaccines. Pharmacy providers will receive the same ingredient cost and administration fee maximums paid to other Medicaid-enrolled providers.

### **Pharmacies Administering Vaccines to Adolescent Beneficiaries**

Certain pharmacy providers that have been selected by MDHHS may obtain vaccines at no cost to provide to Medicaid beneficiaries 11 through 18 years of age through the federal VFC program. The Vaccines for Children (VFC) program was created to provide vaccines to eligible children through enrolled public and private providers. MDHHS selects pharmacy providers to participate in the VFC program based on their location in underserved areas and their ability to meet the program's quality requirements. These providers must offer all VFC-covered vaccines recommended for adolescents, including the influenza and Human Papillomavirus (HPV) vaccines.

Because pharmacy providers can obtain vaccines at no cost through the VFC program, Michigan Medicaid reimburses only the administration fee for vaccines provided to beneficiaries 11 through 18 years of age. Pharmacy providers will receive the same administration fee maximums paid to other Medicaid-enrolled providers.

Provider requirements for the VFC program can be found in the Michigan Vaccines for Children Resource Book for Providers, available online at [www.michigan.gov/vfc](http://www.michigan.gov/vfc). Particular requirements related to services, reporting and records retention, and storage and handling, are highlighted below.

#### **Requirement to Provide Services to All VFC-Eligible Adolescents**

VFC providers must provide vaccine administration services to all VFC-eligible adolescents 11 years through 18 years of age, including those who are uninsured, underinsured, or who are American Indian or Alaska Native.

#### **Requirement to Comply With Recommended Guidelines**

Providers enrolled in the VFC program must comply with vaccine schedules, dosages, and contraindications that are established by ACIP and included in the VFC program unless:

- a) In the delegating physician's medical judgment, and in accordance with accepted medical practice, the provider deems such compliance to be medically inappropriate; or
- b) The particular requirements contradict state law, including laws pertaining to religious or medical exemptions.

#### **Reporting and Records Retention Requirements for Providers in the VFC Program**

Providers must distribute the most current Michigan Vaccine Information Statements (VIS) each time a vaccine is administered and maintain records in accordance with the National Childhood Vaccine Injury Compensation Act (NCVIA), which includes reporting clinically significant adverse events to the Vaccine Adverse Event Reporting System (VAERS).

Providers must maintain all records related to the VFC program, including the documentation elements described in s. 42 USC 300aa-25, for a minimum of three years, or longer if required by state law. These records must be made available to public health officials, including the state or federal Department of Health and Human Services (DHHS) upon request.

## **Storage and Handling Requirements for Pharmacies in the VFC Program**

Providers must comply with the requirements for vaccine ordering, vaccine accountability, and vaccine management as stated in the Michigan Vaccines for Children Resource Book for Providers. VFC providers may not store federally purchased vaccine in dormitory-style refrigerators at any time. VFC providers must use stand-alone refrigerators and freezers for vaccine storage. Pharmaceutical-grade refrigerators are preferred, and commercial-grade refrigerators are acceptable. All spoiled/expired public vaccines must be reported to the Local Health Department and MDHHS within six months of spoilage/expiration.

Providers must participate in VFC program compliance site visits, storage and handling unannounced visits, and other educational opportunities associated with VFC program requirements. In the event that vaccines obtained through the program are wasted due to expiration, negligence and/or improper vaccine storage and handling practices, the pharmacy must provide dose for dose replacement of vaccines wasted with privately purchased vaccine.

Additional requirements for providers in the VFC program are listed on the MDHHS website at the address noted above. VFC enrollment may be terminated for providers who fail to comply with these requirements. In the event of termination, the provider must properly return any unused VFC vaccine to the Michigan VFC program.

## **Manual Maintenance**

Retain this bulletin until the information is incorporated into the Medicaid Provider Manual.

## **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-mail at [ProviderSupport@michigan.gov](mailto:ProviderSupport@michigan.gov). When you submit an e-mail be sure to include your name, affiliation, and phone number so you may be contacted if necessary. Providers may phone toll-free 1-800-292-2550.

## **Approved**



Stephen Fitton, Director  
Medical Services Administration