

## **Kaiser Permanente**

### **COVID-19 Vaccine FAQ**

#### **Contracted and Non-Contracted Providers**

The Coronavirus Aid, Relief, and Economic Security (CARES) Act requires that employer-sponsored and individual health plans subject to the ACA's preventive service mandate cover any new FDA approved coronavirus vaccine, without member cost sharing, fifteen (15) days after each is recommended by the Advisory Committee on Immunization Practices (ACIP).

The purpose of these FAQs is to communicate to Kaiser Permanente (KP) contracted and non-contracted providers how to submit claims for reimbursement of COVID-19 vaccine administration. These FAQs reflect the requirements of the interim final rule (federal regulation) regarding vaccine administration as well as other information.

#### **1. What is the cost share for the COVID-19 vaccine and administration?**

Federal regulation provides that, for the duration of the Public Health Emergency, the cost share must be zero dollars (\$0.00) for the vaccine and/or its administration, and that the vaccine and/or its administration is not subject to the health plan's deductible, if any. The Public Health Emergency declared by HHS Secretary Azar was recently extended through April 20, 2021. The office visit can be charged a cost share if vaccine administration is NOT the primary purpose of the encounter.

#### **2. Must contracted and non-contracted providers obtain preauthorization from KP to administer a COVID-19 vaccine?**

No prior authorization from KP is required to administer the COVID-19 vaccine as mandated by the CARES Act.

#### **3. Can KP members obtain a COVID-19 vaccine from a contracted or non-contracted provider?**

Yes, during the Public Health Emergency, KP members may obtain a COVID-19 vaccine from a contracted or non-contracted provider. Providers must have entered into a CDC COVID-19 Vaccination Program Provider Agreement to administer the COVID-19 vaccine. The Public Health Emergency was declared by HHS Secretary Azar early last year and was recently extended through April 20, 2021.

#### **4. Are providers allowed to bill KP for the COVID-19 vaccine?**

No, providers who receive vaccine dosages from the Federal government at no charge through the Operation Warp Speed (OWS) distribution may not bill for the vaccine. OWS supply is not expected to be exhausted for several months. When providers must procure vaccines at a cost, the process for administration and billing of vaccines will be updated accordingly.

#### **5. How do providers get reimbursed for COVID-19 vaccine administration?**

Providers should bill KP via EDI for vaccine administration to KP commercial members. For vaccine administration to KP Medicare members providers must submit a Medicare fee-for-service claim to CMS. For vaccine administration to KP Medicaid/Medi-Cal members, providers should follow the

applicable state billing requirements. State Medicaid agencies are in the process of developing instructions to submit claims for COVID-19 vaccine administration. More information is available at: <https://www.cms.gov/medicare/covid-19/medicare-billing-covid-19-vaccine-shot-administration>

**6. What is the KP reimbursement rate for COVID-19 vaccine administration to commercial members?**

KP will not reimburse providers for the vaccine, as providers are obtaining it from the federal government which is purchasing and distributing it. KP will reimburse for vaccine administration based on the applicable Medicare rate for all fully-insured (including grandfathered plan) commercial HMO, Kaiser Permanente Insurance Company (KPIC) and self-funded plan members. In network and out of network providers will be reimbursed at the applicable Medicare rate for the location in which administration occurred.

**7. What codes should be submitted to KP for COVID-19 vaccine administration reimbursement?**

Refer to the updated COVID-19 code set which applies to claims submitted to KP for COVID-19 screening and testing, treatment and vaccine administration.

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<sup>1</sup> See also: <https://www.cms.gov/files/document/COVID-19-toolkit-issuers-MA-plans.pdf>