

ForwardHealth **UPDATE**

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COVID-19 VACCINE POLICY AND COVERAGE CLARIFICATIONS

Alignment With Public Readiness and Emergency Preparedness Act

ForwardHealth allows pharmacies, including pharmacists, pharmacy interns, and pharmacy technicians, to administer the COVID-19 vaccine in order to align with the Public Readiness and Emergency Preparedness (PREP) Act and its requirements. The PREP Act does not affect how pharmacies should bill for vaccine administration if they take advantage of the act's provisions and provide vaccination services. Refer to the January 2021 ForwardHealth Update (2021-01), titled "[COVID-19 Vaccine Billing and Reimbursement](#)," for information regarding COVID-19 vaccine administration billing.

COVID-19 Vaccine Coverage for Limited Benefit Plans

ForwardHealth does not reimburse for vaccine administration to non-members or members in limited benefit plans, such as Family Planning Only and Tuberculosis Only.

AFFECTED PROGRAMS

BadgerCare Plus, Medicaid

TO

All Providers, HMOs and Other Managed Care Programs

The information provided in this ForwardHealth Update is published in accordance with the federal Families First Coronavirus Response Act, the Paycheck Protection Program and Health Care Enhancement Act, the Coronavirus Aid, Relief, and Economic Security Act, and the Coronavirus Response and Relief Supplemental Appropriations Act.

Subject to available funding, the U.S. Department of Health and Human Services (HHS) will provide claims reimbursement for certain COVID-19-related services, including vaccine administration, to uninsured individuals. This benefit is available through a contract between UnitedHealth Group and the Health Resources and Services Administration (HRSA) in HHS.

Providers are required to attest that they have made a good faith effort to confirm that a patient was uninsured at the time services were provided. Providers who do not have direct patient contact may rely on the attestation of the ordering health care provider that the patient's health coverage status is uninsured.

Claims received through HRSA's COVID-19 Uninsured Program are reviewed to determine if the member receiving eligible COVID-19 services has other health care coverage. If a member is enrolled in a Medicaid Limited Benefit Plan, HRSA's COVID-19 Uninsured Program will reimburse claims for COVID-19 treatment and vaccine administration.

Providers are not required to confirm immigration status prior to submitting claims for reimbursement. Providers may submit claims for uninsured individuals before Medicaid eligibility determination is complete, but the provider must return the payment to HRSA if the individual is retroactively enrolled in Wisconsin Medicaid.

Reimbursement will be based on current-year Medicare fee schedule rates, except where otherwise noted.

Providers who have administered a licensed or authorized COVID-19 vaccine to an uninsured individual may be eligible for claim reimbursement through the COVID-19 Uninsured Program as long as the service meets requirements.

In order to receive reimbursement payment via direct deposit, providers should:

- Enroll as a provider participant.
- Check patient eligibility.
- Submit patient information and claims.

For information on how to enroll as a provider participant and submit patient information and claims, refer to the [HRSA COVID-19 Claims Reimbursement to Health Care Providers and Facilities for Testing, Treatment, and Vaccine Administration for the Uninsured](#) website.

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Resources

HRSA COVID-19 Claims Reimbursement to Health Care Providers and Facilities for Testing, Treatment, and Vaccine Administration for the Uninsured website: <https://coviduninsuredclaim.linkhealth.com/>

FAQs for COVID-19 Claims Reimbursement to Health Care Providers and Facilities for Testing, Treatment, and Vaccine Administration for the Uninsured: <https://www.hrsa.gov/coviduninsuredclaim/frequently-asked-questions>

COVID-19 Vaccine Coverage for Family Care, PACE, and Partnership Programs

For members enrolled in Family Care, Family Care Partnership, the Program of All-Inclusive Care for the Elderly (PACE), or Wisconsin Medicaid Supplemental Security Income (SSI) who are also dually enrolled in Medicare, providers should bill COVID-19 vaccine administration to Medicare.

For non-dually enrolled Family Care members, medical providers and pharmacy providers should bill COVID-19 vaccine administration to ForwardHealth on a fee-for-service basis.

For non-dually enrolled Family Care Partnership members, medical providers should bill COVID-19 vaccine administration to the member's managed care organization (MCO) and pharmacy providers should bill COVID-19 vaccine administration to ForwardHealth on a fee-for-service basis.

For non-dually enrolled PACE members, medical providers and pharmacy providers should bill COVID-19 vaccine administration to the member's MCO.

Pharmacy providers should refer to [Alert 024](#), titled "ForwardHealth Billing Reminders When Submitting Claims for Vaccinations," for information on how to submit a vaccination claim to ForwardHealth and the January 2021 ForwardHealth Update (2021-01), titled "[COVID-19 Vaccine Billing and Reimbursement](#)," for information regarding COVID-19 vaccine administration billing and reimbursement.

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PROVIDER CLAIM BILLING GUIDE

Program	Medical Providers	Pharmacy Providers
Partnership or PACE on Medicare	Medicare	Medicare
Family Care on Medicare	Medicare	Medicare
Wisconsin Medicaid SSI on Medicare	Medicare	Medicare
Partnership not on Medicare	MCO	Fee-for-service
PACE not on Medicare	MCO	MCO
Family Care not on Medicare	Fee-for-service	Fee-for-service
BadgerCare Plus, Wisconsin Medicaid SSI not on Medicare	HMO	Fee-for-service

Claim Submission for COVID-19 Vaccine Product

This Update clarifies the claims submission policy for COVID-19 vaccine administration announced in Update 2021-01, which states that providers are required to submit claims for the COVID-19 vaccine with procedure codes for **both** the vaccine product as well as for the vaccine administration. This Update clarifies that providers who received the COVID-19 vaccine at no cost may, but are not required to, include a procedure code for the vaccine product on submitted claims. If providers choose to submit a claim with a procedure code for the vaccine product, they may indicate a \$0.00 charge for the procedure code.

“If providers choose to submit a claim with a procedure code for the vaccine product, they may indicate a \$0.00 charge for the procedure code.”

Vaccine Distribution

COVID-19 vaccines are being distributed to Wisconsin residents in a phased approach. The State of Wisconsin is committed to the equitable and fair distribution of the vaccine and is following prioritization guidelines from the federal [Advisory Committee on Immunization Practices](#) and the [State Disaster Medical Advisory Committee](#).

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COVID-19 vaccine supply is limited, and vaccinations are targeted to specific groups of people with a higher risk for COVID-19 infection. It will take time to reach all people within each priority population.

Providers may refer members to the [Wisconsin Department of Health Services](#) website for up-to-date information about what groups are currently eligible to receive the vaccine.

Documentation Retention

Providers are reminded that they must follow the documentation retention requirements per Wis. Admin. Code § [DHS 106.02\(9\)](#). Providers are required to produce or submit documentation, or both, to ForwardHealth upon request. Per Wis. Stat. § [49.45\(3\)\(f\)](#), providers of services shall maintain records as required by the Department of Health Services for verification of provider claims for reimbursement. The Department of Health Services may audit such records to verify actual provision of services and the appropriateness and accuracy of claims. ForwardHealth may deny or recoup payment for services that fail to meet these requirements. Refusal to produce documentation may result in sanctions including, but not limited to, termination from the Medicaid program.

RESOURCES

- [Federal Advisory Committee on Immunization Practices](#)
- [State Disaster Medical Advisory Committee](#)
- [Department of Health Services COVID-19 webpage](#)

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The ForwardHealth Update is the first source of program policy and billing information for providers.

Wisconsin Medicaid, BadgerCare Plus, SeniorCare, and Wisconsin Chronic Disease Program are administered by the Division of Medicaid Services within the Wisconsin Department of Health Services (DHS). The Wisconsin AIDS Drug Assistance Program and the Wisconsin Well Woman Program are administered by the Division of Public Health within DHS.

For questions, call Provider Services at 800-947-9627 or visit our website at www.forwardhealth.wi.gov/.