

COVID-19 Vaccine Distribution: Phase 1

**Overview and Questions and Answers
for Blue Cross NC Agents and Employer Groups**

December 2020

Background

In response to the COVID-19 pandemic, vaccines from Pfizer/BioNTech and Moderna have been submitted to the FDA for emergency use authorization (EUA), and Oxford-AstraZeneca is anticipated to submit for EUA soon. Once the vaccines are available, Blue Cross and Blue Shield of North Carolina (Blue Cross NC) will cover the cost of vaccination with no cost-sharing to members, in accordance with federal laws and regulations. An EUA may occur as early as Dec. 10, 2020.

The Advisory Committee on Immunization Practices (ACIP), a committee within the United States Centers for Disease Control and Prevention (CDC), has considered four groups for initial vaccine allocation, including health care personnel, other essential workers, adults with high-risk medical conditions, and adults aged 65 years or older (including residents of long-term care facilities). These groups were selected based on available scientific data, vaccine implementation considerations, and ethical principles.

Key Points

- As we anticipate an emergency use approval from the FDA for a COVID-19 vaccine soon, Blue Cross NC is preparing so the vaccine will be available at no member cost share to all Blue Cross NC members.
- The vaccine will be allocated, distributed and administered to the public in phases based on availability determined by federal, state and local government authorities. Health officials have recommended, as interim guidance, that both health care personnel and residents of long-term care facilities be offered the COVID-19 vaccine in the initial phase of the vaccination program.
- North Carolinians should refer to the [North Carolina Department of Health and Human Services \(NCDHHS\)](#) for information on who is eligible to receive the vaccine. The first phase of distribution in North Carolina, based on the NCDHHS plan, will be focused primarily on:
 - o Health care workers and medical first responders with a high risk of exposure to the virus or with two or more chronic illnesses
 - o Staff and residents living or working in congregate settings such as long-term care, jails, prisons and migrant camps
 - o Individuals with two or more chronic illnesses (comorbidities)
- Members who live outside of North Carolina will need to follow their local and state guidelines to determine how they should receive the vaccine. States will determine the

appropriate staging on who gets the vaccine first and how it will need to be administered based on supply.

- While additional guidance may be released by NCDHHS later, we're providing key stakeholders with critical information that is known at this time.
- During the public health emergency, the federal government will pay for the cost of the COVID-19 vaccine for all individuals. Additional costs associated with administering the vaccine (such as vaccine supplies, storage and provider costs) will be covered by either the federal government or the member's health plan, depending on the member.
 - For members on a Medicare plan (Medicare and Medicare Advantage), the federal government will pay all vaccine-related costs, with no cost to members.
 - For commercial members, the cost to administer the vaccine will be covered by the member's health plan, with no cost to members.
- We believe the distribution of a safe, effective and clinically approved COVID-19 vaccine is of utmost importance.
- After the public health emergency, Blue Cross NC will cover the cost of the COVID-19 vaccine with no cost-sharing to members, as part of our routine preventative care and immunization benefits in accordance with federal laws and regulations.
- Up-to-date information, preventive tips and resources for our members can be found at BlueCrossNC.com/Coronavirus.

Additional Details by Market Segment

Medicare and Medicare Advantage

- In addition to covering the cost of the vaccine during the public health emergency, the federal government will pay for vaccine administration costs for Medicare and Medicare Advantage members.
 - During the public health emergency, providers should file claims related to the vaccine and administration of the vaccine directly to Traditional Medicare.
 - If providers file vaccine-related claims with Blue Cross NC during the public health emergency, the system will deny the claim and advise the provider to file to Traditional Medicare for Medicare Advantage members.

Commercial

- **Member Cost Share:** For all commercial customers, COVID-19 vaccines will be available at no member cost-share.
- The federal government will pay for the cost of the vaccine for all individuals during the public health emergency.

- o This includes members of individual under 65 plans, grandfathered and non-grandfathered small and large group (fully-insured and Administrative Services Only) plans, transitional plans and student health plans.
- Additional costs associated with administering the vaccine (such as vaccine supplies, storage and provider costs) will be covered by Blue Cross NC (for fully insured plans) and Administrative Services Only (ASO) groups during the public health emergency.
 - o This applies to individual under 65 plans, non-grandfathered small and large group (fully-insured and Administrative Services Only) plans, transitional plans and student health plans.
 - o For customers on a grandfathered group plan, vaccines will be available at no member cost-share. Because of differences in the federal rule related to grandfathered plans, we're working on additional details around how we will handle provider reimbursement for vaccine administrative fees. We will provide more details as soon as possible.
- Blue Cross NC (or ASO groups, for customers on those plans) will cover vaccine administration fees for out-of-network (OON) providers during the public health emergency. Current federal rules prohibit any provider from balance billing patients for the COVID-19 vaccine.

Federal Employee Program (FEP)

- Once an FDA-approved vaccine becomes available for COVID-19, all federal employee health benefit carriers are required to cover the vaccine without any member cost-sharing. The FEP Operations Center is working with the FEP Director's Office to implement this as quickly as possible once FDA-approved vaccines are available.

Questions and Answers – General

Where can individuals get the vaccine?

Please contact [NCDHHS, your state's Department of Health and Human Services](#) or your provider for more information. Providers will organize vaccine clinics and patients can register with their provider to receive the COVID-19 vaccine. Providers will use the COVID-19 Vaccine Management System (CVMS) to determine patient eligibility.

Will Administrative Services Only (ASO) groups be required to cover vaccine costs?

The applicable federal regulations state that the health benefit plan or insurer must cover the admin fee at 100%. This is a temporary benefit change that applies to all plans under federal law during the public health emergency, with the federal government paying the cost of the vaccine, and ASO groups to cover administration costs the same for both INN and OON providers during that time. After the public health emergency, ASO groups will be required to cover the cost for the vaccine and administration costs at 100% for in-network providers.

How will vaccine administration costs be covered for Blue Cross NC customers?

All plans offered by Blue Cross NC will cover the cost of the COVID-19 vaccine and administration fees with no cost-sharing to members.

Medicare will cover, at no member cost-share, both the vaccine and the administration fee in 2020 and 2021.

For members on a commercial plan, the federal government will cover the vaccine costs during the public health emergency. Blue Cross NC (or the ASO group, for customers on those plans) will cover the cost of vaccine administration fees. After the public health emergency, Blue Cross NC and ASO groups will be required to cover the cost for the vaccine and administration costs at 100% for in-network providers.

Will patients be balance billed if they see an out-of-network provider?

Current federal regulations prohibit any provider from balance billing patients for the COVID-19 vaccine.

How does this impact Blue Cross NC members who receive the vaccine outside of North Carolina?

For Blue Cross NC members living or traveling outside of North Carolina, the federal government will cover the cost of the vaccine and Blue Cross NC (or the ASO group, for customers on those plans) will cover the cost of administration fees during the public health emergency. After the public health emergency, the cost of the vaccine and administrative fees will be covered as preventative services and reimbursement will depend on whether the provider is in network or out-of-network.

What if a member gets the vaccine at a retail pharmacy?

For COVID-19 vaccines administered at pharmacies, claims will be covered with no member cost share.

What will the vaccine cost for those not covered by a Blue Cross NC plan?

Please contact your insurance provider, plan administrator or see [covid19.ncdhhs.gov/vaccines](https://www.covid19.ncdhhs.gov/vaccines) for more information.

Where can I learn more?

For more information visit, [covid19.ncdhhs.gov/vaccines](https://www.covid19.ncdhhs.gov/vaccines).

Questions and Answers – Providers

How do providers code the vaccine?

Vaccine Code	Vaccine Code Descriptor	Vaccine Admin Code(s)	Vaccine Manufacturer	Vaccine Name(s)	Labeler Product ID (Vial)	Dosing Interval
91300	Severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) (Coronavirus disease [COVID-19]) vaccine, mRNA-LNP, spike protein,	0001A (1st dose) 0002A (2nd dose)	Pfizer, Inc	Pfizer-BioNTech COVID-19 Vaccine	59267-1000-1 59267-1000-01	21 days

Vaccine Code	Vaccine Code Descriptor	Vaccine Admin Code(s)	Vaccine Manufacturer	Vaccine Name(s)	Labeler Product ID (Vial)	Dosing Interval
	preservative free, 30 mcg/0.3mL dosage, diluent reconstituted, for intramuscular use					
91301	Severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) (Coronavirus disease [COVID-19]) vaccine, mRNA-LNP, spike protein, preservative free, 100 mcg/0.5mL dosage, for intramuscular use	0011A (1st dose) 0012A (2nd dose)	Moderna, Inc	Moderna COVID-19 Vaccine	80777-273-10 80777-0273-10	28 days

Right now, the system is not set up to accept a vaccine admin code without a corresponding vaccine code. We are working to determine the appropriate system and process changes to address this and will share more information as soon as possible.

For commercial members, retail pharmacies are able to file vaccine claims under the member's medical or pharmacy benefits.

Are there differences in coding for different segments?

For Traditional Medicare and Medicare Advantage members: During the Public health emergency, providers should file claims related to the vaccine and administration of the vaccine directly to Traditional Medicare. If providers file vaccine-related claims with Blue Cross Blue Shield of North Carolina (Blue Cross NC) during the emergency, the system will deny the claim and advise the provider to file with Traditional Medicare for Medicare Advantage members.

For customers on a grandfathered group plan, vaccines will be available at no member cost-share. Because of differences in the federal rule related to grandfathered plans, we're working on additional details around how we will handle provider reimbursement for vaccine administrative fees. We will provide more details as soon as possible.

For all other member segments: Providers should follow the coding above and submit claims to Blue Cross NC as usual.

How will providers manage inventory, track vaccine administration and determine patient eligibility?

According to the North Carolina Department of Health and Human Services ([NCDHHS](#)), the COVID-19 Vaccine Management System (CVMS) is a cloud-based vaccine management solution for COVID-19 that enables vaccine management and data sharing across providers, hospitals, agencies and local, state and federal governments on one common platform. NC state officials will enroll providers and verify provider eligibility with verifying site readiness. Providers will use the tool to verify patient eligibility, log dosage administration and track frequency and timing of additional dosages.

How will reimbursement work if a provider is out-of-network (OON)?

According to recent federal legislation, Blue Cross NC must pay the OON provider directly for the administration fees based on the prevailing rate and providers must accept that as payment in full. The Medicare allowed amount for administration of the first dose and second dose is \$16.94 and \$28.39 respectively. This will be the same allowed amount for commercial customers.

Estimated COVID-19 Vaccine Administration Fees	Out-of-Network Providers	
	First Dose	Second Dose
Medicare Customers (Medicare allowed amount for COVID-19 Vaccine Administration)	\$16.94	\$28.39
Commercial Customers (Allowed amount for COVID-19 Vaccine Administration)	\$16.94	\$28.39

How will reimbursement work for in network providers (INN)?

The Medicare allowed amount for administration of the first dose and second dose is \$16.94 and \$28.39 respectively. This will be the same allowed amount for commercial customers.

Estimated COVID-19 Vaccine Administration Fees	In-Network Providers	
	First Dose	Second Dose
Medicare Customers (Medicare allowed amount for COVID-19 Vaccine Administration)	\$16.94	\$28.39
Commercial Customers (Allowed amount for COVID-19 Vaccine Administration)	\$16.94	\$28.39

Will out-of-network (OON) providers be reimbursed after the public health emergency?

Yes, after the public health emergency, the vaccine administrative fees are covered as preventative services. While Blue Cross NC covers preventive care services from OON providers, cost-sharing will be applied in accordance with the member's benefits.