COVID-19 Vaccine | Coding, Billing & Reimbursement Regulations

Updated April 2021
To receive free supplies of the COVID-19 vaccine(s), pharmacies, retail clinics, providers, and any other site of care receiving and administering COVID-19 vaccines must sign an agreement with the U.S. government/CDC. Under the agreement, all providers must vaccinate individuals regardless of whether they have health insurance coverage or what type of coverage they have, and are prohibited from balance billing or otherwise charging vaccine recipients.

Providers administering the vaccine to people without health insurance or whose insurance does not provide coverage of the vaccine, can request reimbursement for the administration of the COVID-19 vaccine through the Health Resources & Services Administration (HRSA) COVID-19 Claims Reimbursement to Health Care Providers and Facilities for Testing, Treatment, and Vaccine Administration for the Uninsured Fund, see https://www.hrsa.gov/CovidUninsuredClaim
Medicare Rates for COVID-19 Vaccine Administration

For services furnished **before** March 15, 2021

- The Medicare payment rate for a single-dose vaccine or for the final dose in a series is **$28.39**

- For a COVID-19 vaccine requiring a series of two or more doses, the **payment rate is $16.94 for the initial dose(s) in the series and $28.39 for the final dose in the series**

- **Rate will be geographically adjusted** based on where the service is furnished.

Effective for services furnished **on or after** March 15, 2021

- **New** Medicare payment rate for administering a COVID-19 vaccine will be approximately **$40 to administer each dose** of a COVID-19 vaccine.

- For **single dose COVID-19 vaccines**, Medicare will pay approximately $40 for its administration.

- For **COVID-19 vaccines requiring multiple doses**, Medicare will pay approximately $40 for each dose in the series.

- **Rate reflects updated information about the costs** involved in administering the COVID-19 vaccine, and the additional resources necessary to ensure the vaccine is administered safely and appropriately.

- **Rate will be geographically adjusted** based on where the service is furnished.
Medicare Billing for COVID-19 Vaccine Shot Administration

How to Bill for COVID-19 Shot Administration

1. Bill on **single claims** for COVID-19 shot administration or submit claims on a **roster bill for multiple patients** at one time.

2. When COVID-19 vaccine doses are provided by the government without charge, only bill for the vaccine administration. **Don’t include the vaccine codes on the claim when the vaccines are free.**

3. For Medicare Advantage Plan, submit COVID-19 claims to **Original Medicare** for all patients enrolled in Medicare Advantage in 2020 and 2021.
Medicare Billing for COVID-19 Vaccine Shot Administration

How to Submit a Claim for Medicare Advantage Plan as a Contracted Provider

Medicare Advantage contracted providers should submit claims for administering COVID-19 vaccines to Original Medicare through MAC as outlined below:

Roster billing for institutional claims, must administer shots to at least 5 patients on the same date, unless the institution is an inpatient hospital. Institute can also submit individual claims.

For hospitalized patients Medicare pays for the COVID-19 shots separately from the Diagnosis-Related Group rate and disallows billing them on 11X.

Roster billing for professional claims, provider must administer the same type of shot to 5 or more people on the same date of service. Providers can also submit individual claims.
## COVID-19 Vaccine Reimbursement Guidance for Different Payers

### Medicare
- COVID-19 vaccine will be covered under the Part B benefit. Pharmacies can enroll in Medicare as a Pharmacy or as a Mass Immunizer online via the Provider Enrollment, Chain, and Ownership System (PECOS) website or using the CMS-855b form.
- Enrollment fees are waived during the COVID-19 Public Health Emergency. Pharmacies that are already enrolled in Medicare as a DMEPOS Supplier or Independent Clinical Laboratory, need to enroll as a Pharmacy or Mass Immunizer to obtain a new Provider Transaction Access Number (PTAN) for vaccine claims.
- Both supplier types, Pharmacy and Mass Immunizer, are able to submit claims for administering COVID-19 vaccine.

### Medicaid
- State Medicaid programs have significant discretion in determining vaccine administration reimbursement rates but all must provide coverage for vaccine administration except to those with narrow range of benefit that does not ordinarily include vaccine coverage.
- States may elect to include vaccine administration coverage in their managed care plan contracts.
- Pharmacies should become familiar with vaccine administration coverage details for each state Medicaid program their patients have.

### Commercial
- Health plans are required to reimburse in-network and out-of-network vaccine providers for administering the COVID-19 vaccine. Health plans may cover this service on the medical benefit, the prescription drug benefit, or both.
- Pharmacies should consider workflow, transaction fees, reimbursement rates and timing of remittance when given the option of medical billing or PBM billing.

### Uninsured
- The COVID-19 vaccine administration, as well as conducting COVID-19 testing, will be covered for the uninsured through the CARES Act (P.L. 116-136). The U.S. Department of Health and Human Services (HHS) will provide reimbursement for these services generally at Medicare rates, subject to available funding through the CARES Act.
- Pharmacies must enroll as a provider participant, check patient eligibility, submit patient information, and submit the claim in order to receive payment via direct deposit.

Appendix
## Billing Codes for COVID-19 Vaccines and their Administration

- This table links the individual severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) (Coronavirus disease [COVID-19]) **vaccine product codes** (91300, 91301) to their **associated immunization administration codes** (0001A, 0002A, 0011A, 0012A), **manufacturer name**, **vaccine name(s)**, 10 and 11-digit National Drug Code (NDC) Labeler Product ID, and **interval between doses**.
- These codes are also located in the **Medicine section of the CPT code set**.

<table>
<thead>
<tr>
<th>Code</th>
<th>CPT Short Descriptor</th>
<th>Labeler Name</th>
<th>Vaccine/Procedure Name</th>
<th>Effective Dates</th>
</tr>
</thead>
<tbody>
<tr>
<td>91300</td>
<td>SARSCOV2 VAC 30MCG/0.3ML IM</td>
<td>Pfizer</td>
<td>Pfizer-BioNTech Covid-19 Vaccine</td>
<td>12/10/2020 – TBD</td>
</tr>
<tr>
<td>0001A</td>
<td>ADM SARSCOV2 30MCG/0.3ML 1ST</td>
<td>Pfizer</td>
<td>Pfizer-BioNTech Covid-19 Vaccine Administration – First Dose</td>
<td>12/10/2020 – TBD</td>
</tr>
<tr>
<td>0002A</td>
<td>ADM SARSCOV2 30MCG/0.3ML 2ND</td>
<td>Pfizer</td>
<td>Pfizer-BioNTech Covid-19 Vaccine Administration – Second Dose</td>
<td>12/10/2020 – TBD</td>
</tr>
<tr>
<td>91301</td>
<td>SARSCOV2 VAC 100MCG/0.5ML IM</td>
<td>Moderna</td>
<td>Moderna Covid-19 Vaccine</td>
<td>12/10/2020 – TBD</td>
</tr>
<tr>
<td>0011A</td>
<td>ADM SARSCOV2 100MCG/0.5ML1ST</td>
<td>Moderna</td>
<td>Moderna Covid-19 Vaccine Administration – First Dose</td>
<td>12/10/2020 – TBD</td>
</tr>
<tr>
<td>0012A</td>
<td>ADM SARSCOV2 100MCG/0.5ML2ND</td>
<td>Moderna</td>
<td>Moderna Covid-19 Vaccine Administration – Second Dose</td>
<td>12/10/2020 – TBD</td>
</tr>
<tr>
<td>91303</td>
<td>SARSCOV2 VAC AD26 .5ML IM</td>
<td>Janssen</td>
<td>Janssen Covid-19 Vaccine***</td>
<td>02/27/2021 – TBD</td>
</tr>
<tr>
<td>0031A</td>
<td>ADM SARSCOV2 VAC AD26 .5ML</td>
<td>Janssen</td>
<td>Janssen Covid-19 Vaccine Administration***</td>
<td>02/27/2021 – TBD</td>
</tr>
</tbody>
</table>

**Additional introductory and instructional information for codes 0001A, 0002A, 0011A, 0012A and 91300, 91301 can be found in the **Immunization Administration for Vaccines/Toxoids and Vaccines, Toxoids guidelines in the Medicine section of the CPT code set.**

**Available from CMS [here](https://www.cms.gov)**
Prescription Billing Pathway for Pharmacy Benefit Managers (PBMs)

The guidance from NCPDP is not a mandate for PBMs, but many may implement the recommendations as published. Most of this can be entered in the drug file in your pharmacy management system.

One-dose COVID-19 vaccine

Use the actual liquid volume (e.g. 0.5 mL) for the Quantity Dispensed, a Days Supply of “1”, Professional Service Code “MA”, and Ingredient Cost of $0.00 or $0.01 (depending on the payer).

Two-dose COVID-19 vaccine

Use the actual liquid volume (e.g. 0.5 mL) for the Quantity Dispensed, a Days Supply of “1”, Professional Service Code “MA”, Ingredient Cost of $0.00 or $0.01 (depending on the payer), and the appropriate Submission Clarification Code (SCC) indicating which dose in the series as follows:

1. **Initial Dose**: Submission Clarification Code of 2 “Other Override” - defined as, “Used when authorized by the payer in business cases not currently addressed by other SCC values,” to indicate the first dose of a two-dose vaccine is being administered.
2. **Final Dose**: Submission Clarification Code of 6 “Starter Dose” - defined as, “The pharmacist is indicating that the previous medication was a starter dose and now additional medication is needed to continue treatment,” to indicate the final dose of a two-dose vaccine is being administered.