

# MEDICAID POLICY INFORMATION SHEET

**Policy Analyst:** Matt Hambleton

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Initial

Public Comment

Final

## Brief description of policy:

The Michigan Department of Health and Human Services (MDHHS) covers COVID-19 vaccine stand-alone counseling without beneficiary cost sharing in accordance with Section 9811 of the American Rescue Plan Act of 2021 (ARP) for beneficiaries under 21 years of age for both the Early and Periodic Screening, Diagnosis, and Treatment (EPSDT) services benefit and the COVID-19 vaccination coverage required under the ARP. This policy updates the previous guidance of letter L 22-04 that was issued on March 1, 2022.

## Reason for policy (problem being addressed):

This bulletin is being issued to support statewide efforts in the administration of Advisory Committee on Immunization Practices (ACIP) recommended vaccines.

## Budget implication:

budget neutral

will cost MDHHS \$ \_\_\_\_\_, and (select one) budgeted in current appropriation

will save MDHHS \$ \_\_\_\_\_

## Is this policy change mandated per federal requirements?

No.

## Does policy have operational implications on other parts of MDHHS?

No.

## Does policy have operational implications on other departments?

No.

## Summary of input:

controversial

acceptable to most/all groups

limited public interest/comment

## Supporting Documentation:

State Plan Amendment Required: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Public Notice Required: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes, please provide status: <input type="checkbox"/> Approved <input type="checkbox"/> Pending <input type="checkbox"/> Denied	If yes, Submission Date:
Date: _____ Approval	Date: _____

<b>DRAFT FOR PUBLIC COMMENT</b>  <b>Michigan Department of Health and Human Services</b>		
	<b>Project Number:</b> 2226-EPSDT	<b>Date:</b> August 29, 2022

**Comments Due:** October 3, 2022  
**Proposed Effective Date:** December 1, 2022  
**Direct Comments To:** Matt Hambleton  
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**E-Mail Address:** [hambletonm@michigan.gov](mailto:hambletonm@michigan.gov)  
**Phone:** 517-284-1209 **Fax:**

<p><b>Policy Subject:</b> Clarification of Stand-alone COVID-19 Vaccine Counseling</p> <p><b>Affected Programs:</b> Medicaid, Healthy Michigan Plan, MICHild, Maternity Outpatient Medical Services (MOMS), MI Health Link</p> <p><b>Distribution:</b> Practitioners, Local Health Departments, Federally Qualified Health Centers, Rural Health Clinics, Medicaid Health Plans, Tribal Health Centers</p> <p><b>Summary:</b> The Michigan Department of Health and Human Services (MDHHS) covers COVID-19 vaccine stand-alone counseling without beneficiary cost sharing in accordance with Section 9811 of the American Rescue Plan Act of 2021 (ARP) for beneficiaries under 21 years of age for both the Early and Periodic Screening, Diagnosis, and Treatment (EPSDT) services benefit and the COVID-19 vaccination coverage required under the ARP. This policy updates the previous guidance of letter L 22-04 that was issued on March 1, 2022.</p> <p><b>Purpose:</b> This bulletin is being issued to support statewide efforts in the administration of Advisory Committee on Immunization Practices (ACIP) recommended vaccines.</p> <p><b>Cost Implications:</b> Budget Neutral</p> <p><b>Potential Hearings &amp; Appeal Issues:</b></p>
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<b>State Plan Amendment Required:</b> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <b>If yes, date submitted:</b>	<b>Public Notice Required:</b> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> <b>Submitted date:</b>
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**Tribal Notification:** Yes  No  - **Date:**

**THIS SECTION COMPLETED BY RECEIVER**

<input type="checkbox"/> <b>Approved</b>	<input type="checkbox"/> <b>No Comments</b>
<input type="checkbox"/> <b>Disapproved</b>	<input type="checkbox"/> <b>See Comments Below</b>
	<input type="checkbox"/> <b>See Comments in Text</b>

<b>Signature:</b>	<b>Phone Number</b>
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**Signature Printed:**

<b>Bureau/Administration</b> <i>(please print)</i>	<b>Date</b>
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# Proposed Policy Draft

Michigan Department of Health and Human Services  
Behavioral & Physical Health and Aging Services Administration

**Distribution:** Practitioners, Local Health Departments, Federally Qualified Health Centers, Rural Health Clinics, Medicaid Health Plans, Tribal Health Centers

**Issued:** November 1, 2022 (Proposed)

**Subject:** Clarification of Stand-alone COVID-19 Vaccine Counseling

**Effective:** December 1, 2022 (Proposed)

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

The Michigan Department of Health and Human Services (MDHHS) strongly encourages providers to offer Advisory Committee on Immunization Practices (ACIP) recommended vaccines for all adults, adolescents, and children at every visit. Vaccine counseling has been shown to help address vaccine hesitancy by helping beneficiaries and their families learn about vaccines from trusted health care providers.

Medicaid covers vaccine counseling services for all children under 21 years of age under the Early and Periodic Screening, Diagnosis, and Treatment (EPSDT) benefit. Additionally, vaccine counseling services are covered for adults as part of the preventive services benefit. Under these benefits, the Medicaid program also covers and reimburses for stand-alone vaccine counseling services. Stand-alone vaccine counseling refers to when a patient and/or caregiver receives counseling about a vaccine from a health care practitioner, but the patient does not actually receive the vaccine on the same date of service as the counseling. Vaccine counseling services are not subject to beneficiary cost-sharing.

To facilitate reporting of vaccine counseling services, providers should report one of the following new Healthcare Common Procedure Coding System (HCPCS) or Current Procedural Terminology (CPT) codes beginning with dates of service on or after December 1, 2022:

## **Adult Stand-Alone Vaccine Counseling**

**G0310** - Immunization counseling by a physician or other qualified healthcare professional when the vaccine(s) is not administered on the same date of service, 5 to 15 minutes time. (This code is used for Medicaid billing purposes.)

**G0311** - Immunization counseling by a physician or other qualified healthcare professional when the vaccine(s) is not administered on the same date of service, 16-30 minutes time. (This code is used for Medicaid billing purposes.)

### **Child / Early and Periodic Screening, Diagnosis, and Treatment (EPSDT) Benefit**

**90460** - Immunization administration through 18 years of age via any route of administration, with counseling by physician or other qualified healthcare professional (QHP), first or only component of each vaccine or toxoid administered.

**90461** - Immunization administration through 18 years of age via any route of administration, with counseling by physician or other QHP, each additional vaccine or toxoid component administered.

**G0312** - Immunization counseling by a physician or other qualified healthcare professional when the vaccine(s) is not administered on the same date of service for ages under 21, 5 to 15 minutes time. (This code is used for Medicaid billing purposes.)

**G0313** - Immunization counseling by a physician or other qualified healthcare professional when the vaccine(s) is not administered on the same date of service for ages under 21, 16-30 minutes time. (This code is used for Medicaid billing purposes.)

### **COVID-19 Child / EPSDT Stand-Alone Vaccine Counseling**

MDHHS covers stand-alone COVID-19 vaccine counseling without beneficiary cost sharing in accordance with Section 9811 of the American Rescue Plan Act of 2021 (ARP) for beneficiaries under 21 years of age for both the EPSDT services benefit and the COVID-19 vaccination coverage required under the ARP. Covered HCPCS codes include:

**G0314** - Immunization counseling by a physician or other qualified healthcare professional for COVID-19, ages under 21, 16-30 minutes time. (This code is used for the Medicaid EPSDT benefit.)

**G0315** - Immunization counseling by a physician or other qualified healthcare professional for COVID-19, ages under 21, 5-15 minutes time. (This code is used for the Medicaid EPSDT benefit.)

The administration of a COVID-19 vaccine includes COVID-19 vaccine counseling. Administration services and COVID-19 vaccine counseling services provided on the same date of service will not be separately reimbursed.

Previous guidance, per [Letter L 22-04](#) that was issued on March 1, 2022, indicated that for stand-alone COVID-19 vaccine counseling services, non-pharmacy providers may submit claims for reimbursement by identifying the service with the appropriate CPT code such as 99401, 99402, 99403, or 99404, as appropriate, in compliance with coding guidelines. Due to updated guidance from the Centers for Medicare & Medicaid Services (CMS), providers should

discontinue the use of these CPT codes and begin using HCPCS codes G0314 and/or G0315 for the stand-alone COVID-19 vaccine counseling services that are provided to beneficiaries eligible for the EPSDT services benefit. Pharmacy providers should continue to bill vaccine counseling as a Medication Therapy Management (MTM) service when billed in accordance with the MTM policy. Documentation must support the service provided.

### **Provider Resources**

For more information regarding the coverage of stand-alone COVID-19 vaccine counseling, refer to the CMS letter of guidance to the states: <https://www.medicaid.gov/federal-policy-guidance/downloads/sho22002.pdf>