

Adult Vaccine Billing and Coding

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Summit

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Disclosures - Tan

- I have received honoraria from Pfizer, Seqirus, Temptime Corp., TruMedSystems, and Sanofi Pasteur for service as a scientific consultant.
 - My honoraria is donated to the IAC
- I do NOT intend to discuss an unapproved or investigative use of a commercial product/device in my presentation.

Disclaimer

The opinions expressed in this presentation are solely those of the presenter and do not necessarily represent the official positions of the Immunization Action Coalition, or the National Adult and Influenza Immunization Summit

Objectives

- **Vaccine Financing in the United States**
- **Challenges Facing Providers of Adult immunizations and Efforts currently ongoing to address them**
- **Tips on properly coding and billing for adult vaccines**
- **Introduce Summit's NEW coding and billing website:**
<https://www.izsummitpartners.org/naiis-workgroups/access-provider-workgroup/coding-and-billing/>.

Vaccine Financing in the United States

Vaccine Financing in the United States

- **Vaccines For Children (VFC, ~45% of children)**
 - Entitlement for children up to age 19 served by:
 - Medicaid
 - Without health insurance
 - American Indians and Alaska Natives
 - Underinsured children can receive VFC vaccines at Federally Qualified Health Centers (FQHCs) or Rural Health Clinics (RHCs)
- **Section 317**
 - No longer be used to cover routine vaccination of children, adolescents, and adults who have public or private insurance that covers vaccination
 - Also has objective to improve adult IZ
 - Stagnant/declining (?) funding

Post ACA - Federal Funding for Immunization Programs

- States may use state funds to purchase adult vaccines under CDC contracts
- Section 317 program was reauthorized, but...
 - Continued battle to sustain annual appropriations for Section 317 Program
 - CDC 2014 professional judgment - \$1,071 million

Program	FY 2015 Appropriations	FY 16 President's Request	FY 16 Committee Recommendation
Section 317 Immunization Program	\$610,847,000	\$560,508,000	\$650,000,000

Vaccine Financing in the United States

- **Medicare**

- Covers vaccines for those 65 years and older
- Influenza, Pneumococcal and Hepatitis B – Part B (by legislation)
- All other vaccines – Part D (eg, shingles)

- **Medicaid**

- Only public sector payer that provides for administration fee
- Admin fee set by states with state-to-state variance; states have to contribute enough funds to draw the maximum federal matching contribution allowable
- Maximum caps are set by CMS for admin fees but states set the floor.

- **Private Sector (~50% of children)**

- Price of vaccine negotiated with distributors/manufacturers
- Payment negotiated with payers
- Providers responsible for administering vaccine then seeking payment (compare with pharmaceuticals where patient fills prescription)

Cost Challenges faced by Providers of Adult Immunizations

Managing the Business of Vaccination: Providers

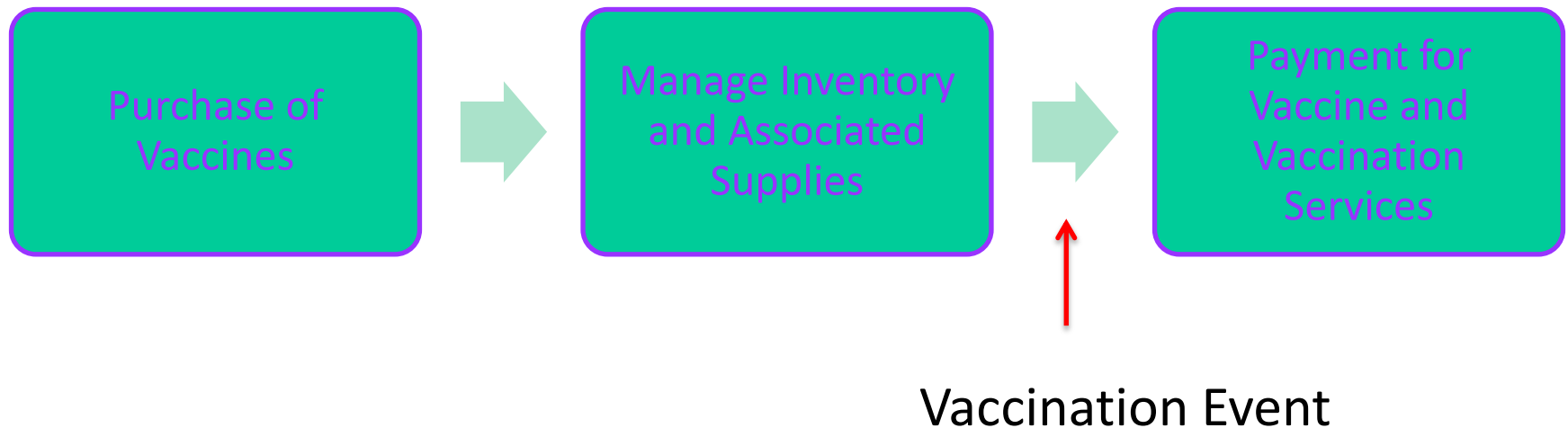


Figure: Shen, et al NVPO

What Does It Cost to Immunize?

- **Vaccine purchase**
 - Ordering
 - Tracking inventory
 - Deferred reimbursement
- **Vaccine storage**
 - Refrigerator/Freezer
 - Back-up power/Alarms
 - Insurance
 - Opportunity cost of inventory
- **Vaccine administration**
 - Staff time
 - Supplies
 - Documentation
 - Figuring out the billing

Issues with the Purchase of Adult Vaccines

- **Newer vaccines are more expensive**
- **There is no federal vaccine purchase program for adults**
- **Vaccine prices can vary as much as 3-fold from provider to provider depending on negotiated prices, which are confidential**
- **Adult vaccine providers do not have the benefits of economies of scale that pediatric practices have**

Cost of Vaccine Storage and Handling

- **Equipment: refrigerator/freezer, temperature monitoring devices**
- **Up front purchase costs**
- **Labor costs to order, track, maintain supply**
- **Backup power**
- **Insurance for inventory**
- **Opportunity cost of hundreds of thousands of dollars tied up in inventory**

Costs of vaccine administration

- **Staff time:**
 - Discussions with parents
 - Vaccine administration
 - Documentation
 - Training
- **Supplies**
- **Billing**

Payment Coverage Challenges

- **All routinely ACIP-recommended vaccines are covered at first dollar to the patient**
 - No co-pays, coinsurance, deductibles
- **In and out-of-network providers**
- **Medicare Part D**
- **Adequacy of payment to provider**
- **What do we do with the uninsured?**

Providers continue to find assessment difficult

- **Must leverage health information technology**
 - Integrating bidirectional data flow between IIS and EHRs
 - MIPS incentives need to be leveraged
- **This costs \$\$\$**
- **What does financing mean for the provider?**

Ongoing Efforts to Address Challenges

National Vaccine Advisory Committee (NVAC) Adult Working Group

- Issued “Pathway to Leadership for Adult Immunizations” report
 - “Financial impediments to vaccinations” identified as a major barrier

Financial barriers existed across multiple target populations

- **Patients**: may be unaware of recommended ACIP vaccines (or know fully covered under the ACA)
- **Providers**: may be learning the “business” of vaccination (not know coverage for payment and how to code)
- **Payors**: payment for vaccine (product) and administration (services)

National Vaccine Advisory Committee (NVAC) Adult Working Group

- **But there is fundamental lack of data and understanding about the actual costs to vaccinate an adult patient...**
 - **What are the data gaps to understanding financing barriers to providers for providing vaccination services?**
 - **What are the types of studies needed to better understand vaccine and vaccination costs associated with providing adult vaccines?**

NVAC Adult WG recommendations to the HHS

- Recommendation #3 was to develop a strategic action plan comprising:
 - Improving general infrastructure
 - **Expanding access to IZ**
 - Implementing provider systems-based interventions
 - Increasing demand for vaccination
 - **Research needs**

Research needs

a. Establishing costs of administering adult vaccines, and basing reimbursement of vaccine administration on these costs

b. Continued collection and evaluation of adult IZ data

c. Studying the econ benefits of adult IZ

d. Studying the impact of differing medical care reimbursement systems on vaccine uptake

e. Evaluation of HCP training

f. Studying adult health-care providers to further examine provider vaccine stocking and administration practices and the relationship to vaccination coverage disparities

g. Evaluation of the 2013–2014 Medicaid reimbursement modification

h. Studying public and provider knowledge, attitudes, and practices related to adult vaccination after implementation of these recommendations

i. Conducting a standardized evaluation of adult vaccination in nontraditional immunization venues

j. Better understanding the impact of health literacy on vaccinations and vaccination disparities

k. Researching the optimal use of social networking

l. Researching state-level policies and practices

m. Researching the development of new and improved vaccines and vaccine delivery systems

Can we learn from the pediatric experience?

- AMA and AAP co-organized 1st Immunization Congress in 2007
- One outcome was the development of an AAP business case for payer education

American Academy of Pediatrics

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The Business Case for Pricing Immunization Administration

One of the goals of the American Academy of Pediatrics (AAP), shared by the American Academy of Family Physicians (AAFP) and the Centers for Disease Control and Prevention (CDC) Advisory Committee on Immunization Practices (ACIP) is to promote maximum immunization coverage for all infants, children, adolescents, and young adults. To achieve this goal, physicians must be paid for the full costs (direct and indirect) of vaccine product-related expenses and vaccine administration expenses as well as the margin for overall overhead expenses. Because the private physician practice is the backbone of the immunization delivery infrastructure, payers must recognize that a pediatric practice is really a business entity and must run on sound, generally accepted business principles to remain viable. Vaccines are among the top overhead expenses for the pediatric practice. Therefore, payments must ensure reimbursement for the total direct and indirect practice expenses and a margin for both the vaccine product and the vaccine administration office costs and the time spent counseling families on the indications for and potential side effects of each vaccine product.

Immunization Administration Expenses: *This service is separately reportable from the vaccine product.* Some payers mistakenly try to maintain that inadequate vaccine payments can be made up by nominal immunization administration fees. *However, these are two separate expenses and both need to be*

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The Business Case for Pricing Vaccines

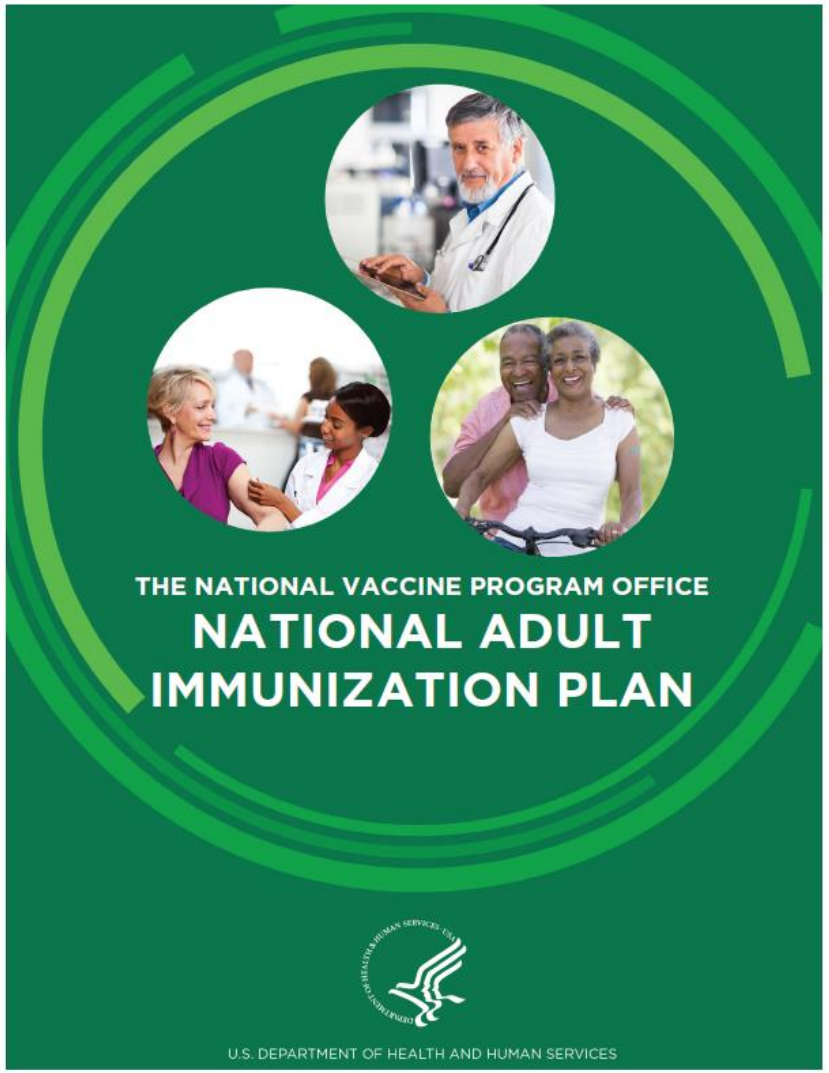
Revised March 2012

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Can we learn from the pediatric experience?

- **And the AAP has made strong effort to educate its providers on strategies such as:**
 - **Proper coding**
 - **Correct elements required for prompt and accurate payment**
 - **Tactics to lower cost of vaccines and vaccine administration (eg. group purchasing orders)**
 - **Ways to improve practice efficiency in delivering vaccines (eg. standing orders)**

THE (FIRST EVER) NATIONAL ADULT IMMUNIZATION PLAN



Four overarching goals

INFRASTRUCTURE



GOAL 1:

Strengthen the adult immunization infrastructure

ACCESS



GOAL 2:

Improve access to adult vaccines

DEMAND



GOAL 3:

Increase community demand for adult immunizations

INNOVATE



GOAL 4:

Foster innovation in adult vaccine development and vaccination related technologies

on
action coalition

IAC
immunize.org

National Adult and Influenza Immunization Summit (The “Summit”)

- Our charge: Determine what we can do as the NAIS and as individual organizations to improve adult and influenza vaccination rates:
 - Identifying data gaps and filling them
 - Identifying barriers and addressing them
- Working Groups
 - Provider and Access
 - Influenza
 - Quality Measures
 - Maternal, Adult composite, ESRD



www.izsummitpartners.org

Manufacturers Provide Hotlines

- **Many manufacturers provide hotlines to assist coders; these may also offer guidance for claims preparation, appeals, and specific payers' vaccine coverage and reimbursement policies**
- **Contact your vaccine representative to learn more about their reimbursement support services**

Summit NEW Coding and Billing Website



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Coding and Billing for Adult Vaccinations

A common problem that has been expressed by providers of adult vaccinations has been the intricacies and complexities associated with coding and billing for those services. Much discussion at meetings of the National Adult and Influenza Immunization Summit ("Summit") has focused on opportunities to provide information to providers to reduce the errors and confusion associated with coding and billing for adult vaccines. The Summit's Access and Provider Workgroup has developed this website in response to this identified need.

At this one web location, you will find the **top questions** identified with coding and/or billing for adult vaccinations, **scenarios** that detail how to go about coding and billing for adult vaccines, and collected **resources** from the Summit's medical association, public health, and vaccine manufacturing partners.

Information Sections

[Top Questions on Coding and Billing for Vaccinations: Avoiding Common Errors](#)

The Summit Provider and Access Workgroup surveyed partners and compiled the top questions associated with coding and billing for adult vaccines. Guidance was developed for each of these questions.

[Scenarios: Straightforward Guidance for Dealing with Common Problems Encountered When Billing for Adult Vaccines](#)

Coding and Billing Subgroup Members

- › Carolyn Bridges, CDC
- › Laura Lee Hall, Sustainable Healthy Communities
- › David Kim, CDC
- › Don Nicholson, TX Dept of Health
- › Jill Powelson, AMGA
- › Angela Shen, NVPO
- › L.J Tan, IAC
- › Laurel Wood, IAC

<https://www.izsummitpartners.org/naiis-workgroups/access-provider-workgroup/coding-and-billing/>

Visit IAC Resources!

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 - <http://www.immunize.org/publications/>
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 - www.izcoalitions.org
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