



Medicaid Policy Issues Related to the COVID-19 Vaccine

Medicaid and CHIP Payment and Access Commission

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Overview

- COVID-19 vaccine coverage
- Stakeholder perspectives
- Federal action
- Other policy considerations

COVID-19 Vaccine Coverage

- The Families First Coronavirus Response Act (FFCRA) requires states to cover COVID-19 vaccines without cost sharing
- After the public health emergency (PHE) ends, coverage requirements revert to prior law where coverage is optional for certain adults
- A Public Readiness and Emergency Preparedness (PREP) Act declaration authorized qualified pharmacists to order and administer COVID-19 vaccinations
 - States should make payment to all qualified pharmacies and pharmacists

Stakeholder Perspectives

- Immediacy of the COVID-19 pandemic could warrant a different approach from other adult vaccines in the near term
- Concern about payment adequacy – Medicaid should at least match the Medicare rates for administration
- Support for flexibilities provided by the PREP Act to permit qualified pharmacists to administer the COVID-19 vaccine
- Emphasis on the importance of timely and accurate data, including by race/ethnicity
- Consensus on the need to address disparities in vaccine uptake
- Support for policies that would increase federal funding for the purchase and administration of the COVID-19 vaccine

Federal Action

- Administrative action
 - Executed new vaccine purchasing agreements
 - Signaled that the PHE is likely to extend through the end of the year
 - Started direct distribution of vaccines to federally qualified health centers
- Budget reconciliation legislation
 - Requires mandatory coverage of the COVID-19 vaccine without cost sharing and provides 100 percent federal match for vaccine and administration spending for one year after the PHE ends
 - Provides additional funding to advance vaccine distribution, uptake, transparency, and surveillance

Other Considerations

- Provider payment rates
 - 39 states paying at or above the Medicare rate for COVID-19 vaccine administration and ten states paying less than Medicare
 - Reconciliation bill does not require states to pay the Medicare rate or set a minimum payment amount for vaccine administration
- Data collection and sharing
 - Improve data collection and reporting on vaccination by race/ethnicity
 - Improve coordination of immunization information between Medicare and Medicaid for dually eligible beneficiaries and sharing of information with Medicaid managed care plans

Next Steps

- The reconciliation bill appears to address many of the short-term issues that were identified by stakeholders
- Staff will continue to monitor activity and update Commissioners if further action may be needed
 - Potential need for booster or annual vaccination to address variants and maintain immunity
- Continue to examine strategies to improve access to vaccines in general for Medicaid-enrolled adults



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