

DATE: September 11, 2020

TO: IHS & 638 Tribal Pharmacies
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FROM: Suzi Berman, RPh

SUBJECT: Flu Vaccine Administration For Members 3 Years Through 18 Years Of Age

On Monday, August 31st, 2020, Governor Ducey held a press conference on the importance of all Arizonans getting a flu shot for the upcoming influenza season. The press conference focused on the State's effort to increase flu vaccination rates this fall and winter:

<https://azgovernor.gov/governor/news/2020/08/governor-ducey-and-health-leaders-urge-arizonans-get-flu-shot>.

The agency has been working diligently to expand access to flu vaccine administration and the expansion allows Fee-For-Service (FFS) members ages 3 through 18 years of age to now obtain their flu shot at an IHS, 638 Tribal or other Optum network pharmacy. All members enrolled in AHCCCS Fee-For-Service, who would like to obtain a flu shot at a pharmacy, are required to use a pharmacy that is part of the Optum FFS Pharmacy Network.

The flu vaccine in accordance with A.R.S. §32-1974 may be administered by pharmacists approved to immunize and interns under the supervision of approved pharmacists to children ages 3 years of age and older. We recognize that IHS/638 Tribal pharmacists may not be registered with the Arizona State Board of Pharmacy, however, they are required to be trained to provide immunizations and emergency medications.

For clarification, only the flu vaccine may be given to children and adolescents 3 years through 18 years of age at a pharmacy. For the expanded age group, we do not expect utilization of the high dose vaccine. Members ages 3 through 18 years of age, in need of other vaccines, should be redirected to their primary care provider.

The primary care provider is required to obtain vaccines for this age group through the Vaccine For Children Program (VFC). For more information regarding the VFC program and billing requirements, please refer to the IHS/638 billing manual (page 146).

All Arizona pharmacies are currently not VFC registered providers and therefore the flu vaccine administered by pharmacists and interns must be purchased by the pharmacy and the vaccine plus the administration fee must be submitted as a prescription claim through Optum, the FFS Pharmacy Benefits Manager (PBM). All members ages 3 and older may receive the flu vaccine at the pharmacy, a clinic or other approved setting. AHCCCS will not reimburse for more than one setting.

The AIR may be billed by the pharmacy through Optum when the flu immunization is administered at the pharmacy.

Due to COVID-19 and the urgency to immunize for the upcoming flu season, pharmacists that administer flu vaccines offsite, for example, for a mass immunization clinic, the pharmacy shall submit the AIR to Optum for enrolled Title XIX members who have received the flu vaccine at an offsite location.

Children ages 3 years through 18 years, that are seen in the clinic for a PCP appointment, must be immunized with a flu vaccine that has been obtained from or will be replaced by the VFC program.

If the pharmacist or intern under the supervision of a pharmacist is providing the flu vaccination outside of the pharmacy, the AIR may be billed. If the pharmacy is billing as a part of a hospital and/or a hospital-affiliated (provider-based) clinic, the “four-walls” provision does not apply. If the pharmacy is associated with a free standing clinic, the “four-walls” provision is applicable, however, DFSM, in alignment with guidance from CMS, will not review claims for adherence to the “four walls” provision until January 30, 2021.

Optum is in the process of making the change to allow IHS, 638 Tribal and other Optum network pharmacies to be reimbursed for the cost and administration of flu vaccine for members whose ages are 3 years of age and older, however, there is no waiting to immunize adults and submit these claims to Optum. This change for the expanded population will be retroactive to the effective date of September 1, 2020.

Please contact me if you have any questions or concerns.

Stay Safe, Mask Up & Vaccinate!

Thank you for all that you are doing for our shared members!