

COVID-19 Vaccine Overview and Frequently Asked Questions

On November 5, 2020, the Centers for Medicare & Medicaid Services (CMS) released a set of toolkits for providers, states and issuers to help the healthcare system prepare to swiftly administer the COVID-19 vaccine.

Section 3713 of the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) specifies that a COVID-19 vaccine and its administration will be covered under Medicare Part B and, therefore, would be excluded from Part D coverage. For calendar years (CY) 2020 and 2021, Medicare payment for the COVID-19 vaccine and its administration for beneficiaries enrolled in Medicare Advantage plans will be made through the original fee-for-service Medicare program.

Section 3203 of the CARES Act generally requires issuers offering non-grandfathered group or individual health insurance coverage to cover any qualifying coronavirus preventive service, including a COVID-19 vaccine, without imposing any cost-sharing requirements, such as copays, coinsurance or deductibles.

- A qualifying coronavirus preventive service means an item, service or immunization that is intended to prevent or
 mitigate COVID-19 and that is, with respect to the individual involved, (1) an evidence-based item or service that
 has in effect a rating of "A" or "B" in the current recommendations of the United States Preventive Services Task
 Force (USPSTF) or (2) an immunization that has in effect a recommendation from the Advisory Committee on
 Immunization Practices (ACIP), regardless of whether the immunization is recommended for routine use.
- This coverage under section 3203 of the CARES Act must be provided no later than 15 business days after the date
 that ACIP or the USPSTF makes an applicable recommendation relating to the qualifying coronavirus preventive
 service. To ensure maximum rapid public take-up of the vaccine, we encourage all issuers to prepare to cover
 administration of the COVID-19 vaccine immediately upon ACIP's recommendation. Coverage does not depend on
 the type of FDA approval (EUA vs BLA) or authorization.
- These coverage requirements do not apply to a plan or coverage that is not required to provide coverage of
 preventive services without cost sharing under section 2713 of the Public Health Service Act, such as grandfathered
 health plans, excepted benefits or short-term limited duration insurance, though we encourage all such plans to
 provide this coverage to all enrollees without cost sharing.

In December 2020, the U.S. Food and Drug Administration (FDA) issued emergency use authorizations (EUAs) allowing the Pfizer-BioNTech COVID-19 vaccine and the Moderna COVID-19 vaccine to be distributed in the U.S. In late February 2021, the FDA issued an EUA for the Johnson & Johnson COVID-19 vaccine, developed by the Janssen Pharmaceutical Companies of Johnson & Johnson.

On August 23, 2021, the FDA formally approved the Pfizer-BioNTech COVID-19 vaccine. It will now be marketed as Comirnaty for the prevention of COVID-19 disease in individuals 16 years of age and older. The vaccine also continues to be available under an EUA, including for individuals who are 5 through 15 years of age and for the administration of a third dose in certain immunocompromised individuals.

See the table at the end of this document for more information about approvals and authorizations.

The vaccine itself will be paid for through funding authorized by the CARES Act, but administration of the vaccine by a pharmacy is paid for by the payer.



Pharmacy Network Communication

- 1. Pharmacies received an <u>initial email communication</u> from Elixir on December 11 and another email communication on December 17 with information on how to become vaccinators and how to submit claims.
 - Elixir included links to the National Council for Prescription Drug Programs (NCPDP) Emergency
 Preparedness Guidance and the CMS provider toolkit for pharmacies to ensure awareness of their reporting
 requirements and how to become vaccinators for the COVID-19 vaccine.
- 2. Vaccine administration fees are configured for the COVID-19 vaccine at the CMS standard payment rates. CMS updated the standard payment rates on March 15, 2021.

For COVID-19 vaccine administration 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.

For COVID-19 vaccine administration services furnished on or after March 15, 2021, the Medicare payment rate for each dose of a COVID-19 vaccine is \$40.

- 3. Elixir has updated the Pharmacy Provider Manual with this information.
- 4. Elixir Customer Care Center staff is receiving training to be able to respond to pharmacy and member calls and answer questions on the policies and guidelines.

Claim System Configuration

- 1. Claims system configuration is currently available to accept in-network and out-of-network pharmacy submissions for vaccine administration for non-Medicare plan sponsors.
- 2. For Medicare plans, claims for the vaccine will reject A5 (Not Covered Under Part D Law) with additional messaging, "Bill to Medicare B FFS."
- 3. Members will NOT be charged any cost share for the vaccine or its administration.
- 4. The vaccine will be covered for all non-Medicare plans. Plans that are not required to provide coverage of preventive services without cost sharing under section 2713 of the Public Health Service Act, such as grandfathered health plans, excepted benefits or short-term limited duration insurance, <u>must notify your Elixir account manager if an</u> exception is requested to this configuration and wish to exclude the vaccine. Exceptions are not recommended.

FAQs

Q: Will members be able to get the COVID-19 vaccine at network pharmacies?

A: Yes. Claims for the administration of the vaccine for non-Medicare members will process through Elixir at \$0 member copay. Claims submitted for Medicare members will reject with special messaging to the pharmacy to bill Medicare B FFS.

Elixir will allow in-network and out-of-network vaccinator pharmacies to process the administration fee for all non-Medicare plans.



Q: What is the guidance from the CDC for distribution?

A: The CDC's COVID-19 Vaccination Program Operational Guidance can be found here.

Q: Will the vaccine be restricted to certain pharmacies?

A: Yes. 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. They must also administer the vaccine in accordance with CDC and ACIP requirements and must meet storage and recordkeeping requirements, including recording the administration of the vaccine to patients in their own systems within 24 hours and reporting to public health data systems as soon as practical, and within 72 hours.

Pharmacies that are not contracted with Elixir or who have been removed from the network for OIG sanctions, FWA or other concerns will be handled on a case-by-case basis.

Q: What will the COVID-19 vaccine cost?

A: The vaccine itself will be paid for through funding authorized by the CARES Act, but administration of the vaccine by a provider will be paid for by the payer (for example, the private insurance company, Medicare in the case of a Medicare Advantage plan or the Provider Relief Fund). 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. 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. The federal government has purchased the initial supply of vaccines.

- Medicare Advantage Coverage and Reimbursement: For calendar years (CY) 2020 and 2021, Medicare
 payment for the COVID-19 vaccine and its administration for beneficiaries enrolled in Medicare Advantage plans
 will be made through the original fee-for-service Medicare program.
- Non-Medicare plans will be responsible for paying administration fees.

Q: How will the price differ for out-of-network (OON) pharmacies?

A: The administration fees will be the same for all pharmacies that are enrolled to be vaccinators.

Q: What will the vaccination process be?

A: One of the vaccines requires a single dose while the other two vaccines require two doses to be administered at different intervals. On August 13, 2021, the CDC officially recommended an additional dose of either mRNA COVID-19 vaccine for people with moderately to severely compromised immune systems after the initial two-dose vaccine series. This includes a range of conditions, a full list of which can be found on the CDC's website here.

As of November, 2021, the CDC updated its guidance for those who received either of the mRNA vaccines. As a result, everyone aged 18 and older **may** now get a booster shot at least 6 months after their initial series of vaccinations. See the chart below for details.



Those who received the Pfizer-BioNTech or Moderna Vaccines

Should get a booster if they are:

- Ages 50 years and older
- Ages 18 years and older and living in a <u>long-term care</u> setting

May get a booster if they are:

· Ages 18 years and older

When should they get boosters?

At least 6 months after completing their primary COVID-19 vaccination series

Which booster should they get?

Any of the COVID-19 vaccines authorized in the United States

Those who received the Johnson & Johnson Vaccine

Should get a booster if they are:

Ages 18 years and older

When should they get a booster?

At least 2 months after the initial vaccination

Which booster should they get?

Any of the COVID-19 vaccines authorized in the United States

Q: For those vaccines that require more than one dose, will pharmacies bill separately for the additional dosages? A: Yes. Each dose will be billed separately. Up to three doses of the vaccine will be available for each member. Elixir will evaluate and comply with ongoing NCPDP recommendations and other regulatory guidance updates.

Q: Will COVID-19 vaccines be covered by Medicare?

A: Yes. For beneficiaries enrolled in Medicare Advantage plans during CY 2020 and 2021, payment for the COVID-19 vaccine and its administration will be made through the original fee-for-service Medicare program. Medicare Advantage plans should inform their contracted providers about this coverage policy and direct them to submit claims for administering the COVID-19 vaccine to the CMS Medicare Administrative Contractor (MAC) using product-specific codes for each vaccine approved. More information is available in the CMS Toolkit on COVID-19 Vaccine. Elixir provided this information to the pharmacy network.

According to <u>guidance from the National Council for Prescription Drug Programs</u>, the reject messaging for Medicare Part D BIN/PCN (PDP or MAPD) will be A5 (not covered under Part D law) with additional messaging to bill Medicare Part B FFS.

Q: Will members be able to submit a Direct Member Reimbursement (DMR) if they are required to pay the pharmacy for the administration fee?

A: Since members will receive the vaccine at no copay/cost share or deductible, there is no need for a DMR.

Q: Will Elixir be charging a separate per-claim COVID-19 vaccine transaction processing fee?

A: Elixir will charge the fee to administer the vaccine in addition to any per-claim administrative fee as provided for in the PBM contract.

Q: Can a pharmacy obtain the vaccine and submit a claim if they have not been granted approval by the government?



A: Pharmacies must receive approval from the government to receive and administer the vaccine. Elixir does not monitor the approval pathway for pharmacies to obtain the vaccine and will allow claims to process if submitted for the vaccine and administration, assuming the pharmacy has the vaccine in hand.

Q: How will COVID-19 vaccines work?

A: COVID-19 vaccines will work like other vaccines, which expose recipients to antigens. These antigens help those who are vaccinated to develop an immune response that will be able to block or kill the virus if a person becomes infected. Although some vaccines can provide long-lasting immunity, we do not yet have enough information to evaluate the duration of protection from the COVID-19 vaccine. Scientists will continue to collect long-term immunity data to determine if changes to the COVID-19 vaccine are needed and to determine long-term dosing requirements.

Q. Will the COVID-19 vaccine be like the flu vaccine and require annual dosing?

A: More data is required to determine if COVID-19 vaccines will be needed every year. See earlier question, "What will the vaccination process be?" for current information and updates on vaccine recommendations.

Q: Most vaccines take years to develop. How were we able to speed up development for a COVID-19 vaccine and has that affected its safety?

A: It's correct that vaccine development typically takes years. However, in this case, developers were able to speed up the process, in part because of efforts that had been underway on previously known coronaviruses (SARS-CoV-1 and MERS CoV). In addition, the U.S. government aided the process by invoking emergency authority to enable manufacturing to start while the clinical trials were ongoing. Data collected from thousands of participants in clinical trials help the FDA determine the safety of the vaccine. Currently available vaccines have been proved by the FDA to be safe and effective. The safety and efficacy of available vaccines is the top priority for the federal government, and all adverse events reported following COVID-19 vaccine administration are taken very seriously by the FDA.

Q: What is emergency use authorization?

A: An EUA is a way to facilitate the availability and use of medical countermeasures, including vaccines, during public health emergencies. Under an EUA, the FDA may allow unapproved medical products, or unapproved uses of approved medical products, in an emergency to diagnose, treat or prevent serious or life-threatening diseases or conditions.

Q: What are some of the clinical considerations or uncertainties concerning these vaccines?

A: Two of the currently offered vaccines are messenger RNA vaccines, or mRNA vaccines. These utilize a new approach to protecting against infectious diseases and will be the first of their kind to be licensed in the United States. The third vaccine is



manufactured using adenovirus type 26 (Ad26) to deliver a piece of the DNA, or genetic material, that is used to make the distinctive "spike" protein of the SARS-CoV-2 virus.

Vaccine	Population	Common Side Effects	Dosing ^{1,2, 3, 4, 5}
Pfizer- BioNTech	Authorized for use in those aged 5 and older and contraindicated for individuals with a known history of a severe allergic reaction (e.g., anaphylaxis) to any vaccine component; FDA-approved for the prevention of COVID-19 disease in individuals 16 years of age and older.	Side effects of the vaccine typically resolve within 1-2 days and commonly include things like injection site reactions, fatigue, headache, muscle pain, chills, joint pain, nausea, feeling unwell, swollen lymph nodes and fever.	Series of two doses (30 mcg, 0.3 mL each for adults; 10 mcg. for age 11 and younger) administered intramuscularly, three weeks apart, with a third-dose option for some.
Moderna	Authorized for use in those aged 18 and older and contraindicated for individuals with a known history of a severe allergic reaction (e.g., anaphylaxis) to any vaccine component	Side effects of the vaccine typically resolve within 1-2 days and commonly include things like injection site reactions, fatigue, headache, muscle pain, chills, joint pain, nausea and vomiting and fever.	Series of two doses (100 mcg, 0.5 mL each) administered intramuscularly, one month apart, with a third-dose option for some.
Johnson & Johnson/ Janssen ⁶	Authorized for use in those aged 18 and older and contraindicated for individuals with a known history of a severe allergic reaction (e.g., anaphylaxis) to any vaccine component	Side effects of the vaccine typically resolve within 1-2 days and commonly include things like injection site reactions, fatigue, headache, muscle pain, and nausea.	Single dose (0.5 mL each) administered intramuscularly.

^{1.} According to interim CDC clinical considerations, doses administered within a grace period of ≤4 days from the recommended date for the second dose are considered valid; however, doses administered earlier do not need to be repeated. The second dose should be administered as close to the recommended interval as possible. However, there is no maximum interval between the first and second dose of either vaccine.

- 2. Both doses of the two-dose series should be completed with the same product. However, if two doses of different mRNA COVID-19 vaccine products are inadvertently administered, no additional doses of either product are recommended at this time.
- 3. For the immunocompromised, a third-dose of mRNA vaccine should be administered at least 28 days after the second dose.
- 4. mRNA vaccines: Booster shots are now available for everyone aged 18 and older, to be administered at least six months after the completion of either mRNA vaccine series
- 5. Johnson & Johnson vaccine: The CDC is recommending a booster shot, to be administered at least two months after the vaccine.
- 6. Out of an abundance of caution, the CDC and FDA recommended a pause in the use of the Johnson & Johnson COVID-19 vaccine, but usage has been resumed because the available data show that the vaccine's known and potential benefits outweigh its known and potential risks in individuals 18 years of age and older.

The CDC advises that vaccine providers observe patients with a history of allergic reactions (due to any cause) for 30 minutes after vaccination. All other persons should be observed for 15 minutes after vaccination to monitor for the occurrence of immediate adverse reactions. The CDC also states that appropriate medical treatment must be immediately available to treat a patient who experiences a severe allergic reaction to the vaccine.

Healthcare providers administering the Johnson & Johnson vaccine and vaccine recipients or caregivers should review the <u>Janssen COVID-19 Vaccine Fact Sheet for Healthcare Providers Administering Vaccine (Vaccination Providers)</u> and the <u>Fact Sheet for Recipients and Caregivers</u>, which have been revised to include information about the risks that have occurred in a very small number of people who have received the Johnson & Johnson COVID-19 vaccine. Health care providers are asked to report adverse events to the <u>Vaccine Adverse Event Reporting System</u>.



Q: Are COVID-19 vaccines available at Rite Aid locations?

A: Yes. For updated information on vaccine eligibility in your area and for scheduling appointments at Rite Aid, visit Rite Aid's <u>COVID-19 page</u>. Vaccine doses are limited, and availability is updated daily. Store and pharmacy associates are not able to schedule appointments.

Q: Which vaccines is Rite Aid administering?

A: Rite Aid is administering all three vaccines across its various locations. Visit Rite Aid's website to learn more.

Q: Will Elixir/Rite Aid support on-site or workplace vaccination events?

A: COVID-19 vaccination clinics are available dependent upon vaccine supply, number of employees, location and cost to administer. If interested, the benefits administrator for your plan should contact a member of their Elixir account team. On-site clinics and/or in-store vouchers for other vaccines, such as flu, pneumonia, shingles, tetanus and hepatitis A or B are available. Benefits administrators can get more information on Rite Aid's workplace immunization site.