

REIMBURSEMENT GUIDE FOR SKILLED NURSING FACILITY HEALTH CARE PERSONNEL FLU AND COVID-19 VACCINATIONS



FREQUENTLY ASKED QUESTIONS ON VACCINE PAYMENT OPTIONS TO OPTIMIZE SNF STAFF VACCINE UPTAKE

1. Are Influenza and COVID-19 vaccines required for SNF staff?

There are no federal requirements that staff receive these vaccines. However, there is a regulatory requirement to educate and offer the COVID-19 vaccine to staff and residents and educate and offer the flu vaccine to residents. AHCA/NCAL's #GetVaccinated toolkit contains a [summary of the CMS vaccine regulations](#).

Some states may have regulations about health care workers (HCW) receiving these vaccines. For example, some states require either the influenza vaccine or that the HCW uses a source control mask when around patients during high activity of influenza in the community. You need to check with your state health department about any state specific requirements for vaccination.

2. Are there any quality measures for SNF staff vaccinations?

Yes. The SNF Quality Reporting Program (QRP) creates SNF quality reporting requirements as mandated by the Improving Medicare Post-Acute Care Transformation Act of 2014 (IMPACT Act). Currently there are two staff vaccination quality measures:

SNF QRP Measure #11: COVID-19 Vaccination Coverage among Health Care Personnel (HCP) (CBE #3636)

- This measure was finalized in the [FY 2022 SNF PPS Final Rule](#), (86 FR 42480 through 42489). Data submission for this measure began October 1, 2021.

SNF QRP Measure #12: Influenza Vaccination Coverage among Health Care Personnel (HCP) (CBE #0431)

- This measure was finalized in the [FY 2023 SNF PPS Final Rule](#), (87 FR 47537 through 47544). Data submission for this measure began October 1, 2022.

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If a SNF fails to submit the required quality data, the SNF will be subject to a two percentage (2%) point reduction in the Annual Payment Update (APU) for the applicable performance year.

Data for these measures are submitted via the Centers for Disease Control and Prevention's (CDC) National Health Care Safety Network (NHSN). Information related to the procedures using the CDC NHSN for data submission for the COVID-19 and Influenza Vaccination Coverage among HCP measures can be found on the [NHSN](#) website. For NHSN questions: NHSN@cdc.gov.

3. Who does CMS consider HCP that the SNF must report the vaccination status on?

The denominator for the COVID-19 and Influenza SNF QRP measures consists of HCP who are physically present in the health care facility for at least one working day:

- During the calendar year for the COVID-19 vaccine (reported weekly - at least one week per month).
- Between October 1 through March 31 of the following year for the Influenza vaccine (reported at least once covering the entire flu season).

Denominators are to be calculated separately for the following categories of HCP as described:

- Employees (mandatory):** This includes all persons receiving a direct paycheck from the reporting facility (i.e., on the facility's payroll), regardless of clinical responsibility or patient contact.
- Licensed independent practitioners (LIPs) (mandatory):** This includes physicians (MD, DO), advanced practice nurses, and physician assistants who are affiliated with the reporting facility, but are not directly employed by it (i.e., they do not receive a paycheck from the facility), regardless of clinical responsibility or patient contact. Post-residency fellows are also included in this category if they are not on the facility's payroll.

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- c. **Adult students/trainees and volunteers (mandatory):** This includes medical, nursing, or other health professional students, interns, medical residents, or volunteers aged 18 or older who are affiliated with the healthcare facility, but are not directly employed by it (i.e., they do not receive a paycheck from the facility), regardless of clinical responsibility or patient contact.
- d. **Other contract personnel:** Contract personnel are defined as persons providing care, treatment, or services at the facility through a contract who do not fall into any of the other denominator categories. Please note this also includes vendors providing care, treatment, or services at the facility who may or may not be paid through a contract. Reporting for this category is mandatory for COVID-19 vaccine and is optional for the Influenza vaccine. Also, the denominator for the COVID-19 measure excludes HCP with medical contraindications to COVID-19 vaccine.

For more information on Measure Specifications:

- [CDC COVID-19 Vaccine Operational Guidance for Long-term Care Facilities – July 2023](#)
- [CDC Influenza Vaccine Operational Guidance for Long-term Care Facilities – January 2023](#)

4. Is the reported SNF staff vaccination data publicly reported?

CMS must make quality data available to the public through the [Care Compare](#) website. To ensure accuracy of this publicly reported data, CMS gives SNFs the opportunity to review the data before they are posted. Please see the [SNF Quality Reporting Program Help](#) web page for further assistance and contact information.

5. Is the Federal Government providing any of these the vaccine product for free?

No. While the U.S. Government (USG) provided many pandemic-related products for free during the COVID-19 PHE, the U.S. Department of Health and Human Services ([HHS](#)) [transitioned the purchase and distribution of the COVID-19 vaccine to the commercial market](#) in the fall of 2023, similar to how other vaccines have historically been made available to the public.

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The Centers for Disease Prevention and Control (CDC) established the [Bridge Access Program](#) that will temporarily provide no-cost COVID-19 vaccines to adults without health insurance and adults with insurance that does not cover all COVID-19 vaccine costs.

6. How are SNF staff vaccines paid for?

Vaccines for staff are typically covered by their medical insurance at no or little cost through pharmacies, while uninsured or underinsured staff vaccines may access vaccine for free through the [Bridge Access Program](#) or by public agencies.

HHS has established a [“How to Pay” website](#) that provides details on vaccine coverage and costs for Private Health Insurance, Military Insurance, Medicare, and Medicaid. It also contains links to federally funded health centers and the health departments of each state to learn about options for uninsured and underinsured individuals.

7. What options do SNF providers have to facilitate staff vaccinations, especially for COVID-19 and Influenza?

There are multiple pathways:

1. For insured employees –

- a. Consider making arrangements with your LTC pharmacy to offer onsite staff vaccine clinics. The LTC pharmacy may be able to bill the insurance company or use the [Bridge Access Program](#) to collect payment. This option makes it easier to track HCP vaccination status.
- a. Check with your employee’s insurance company to see if you can submit a claim to them directly for the vaccine and administration costs. This option makes it easier to track HCP vaccination status.
- b. Consider incentivizing employees to obtain the vaccination(s) at their local pharmacy. Develop a process to confirm and record that the employee obtained the COVID-19 and/or Influenza vaccine.

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2. For uninsured employees –

- a. Consider making arrangements with your LTC pharmacy to offer onsite staff vaccine clinics. The LTC pharmacy may be able to obtain reimbursement through the [Bridge Access Program](#).
- b. Work with your local [state health department](#) or [federally funded health center](#) to help the employee obtain the COVID-19 and/or Influenza vaccine for free. Develop a process to confirm and record that the employee obtained the COVID-19 and/or Influenza vaccine.

3. For non-employees that the facility is required to report HCP vaccination status on, including licensed independent practitioners, adult students/trainees and volunteers, and other contract personnel –

- a. Educate these HCPs about the reporting requirement and offer the HCP information on options for obtaining free or low-cost vaccines as discussed above for insured or uninsured employees above. Develop a process to confirm and record that the employee obtained the COVID-19 and/or Influenza vaccine.

8. Where can I find more information on how to code and bill for the COVID-19 and Influenza Vaccine if I administer the vaccine to HCP that have insurance?

Providers should contact the HCP personnel's insurer for plan-specific billing guidance.

For reference, CMS has posted updated lists of Medicare Part B codes, effective dates, and Medicare pricing for [Seasonal Flu Vaccines](#) and [COVID-19 Vaccines](#).

9. Are there AHCA/NCAL resources available to educate SNF HCP about these vaccines?

Providers can refer to the AHCA/NCAL 2023 [#GetVaccinated Toolkit](#).