

Reimbursement Guide For Skilled Nursing Facility Health Care Personnel



Federal guidance for the 2026–2027 respiratory virus season is forthcoming.
Resources will be updated as new recommendations become available.

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

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

There is no current federal CMS mandate requiring SNF staff to receive influenza or COVID-19 vaccination. CMS's temporary requirement that long-term care facilities educate residents and staff about COVID-19 vaccination and offer the vaccine expired on May 21, 2024. See [CMS guidance on expiration of the COVID-19 PHE requirements](#).

CMS requires nursing homes to offer and educate residents or their representatives regarding the influenza and COVID-19 vaccines. In addition CMS requires nursing homes to provide education staff regarding the COVID-19 vaccine, along with offering or providing information on how to obtain the vaccine.

Staff influenza vaccination remains strongly recommended as an infection prevention practice, and SNFs continue to report HCP influenza vaccination data through the SNF Quality Reporting Program (SNF QRP).

State or local requirements may apply to health care workers. Facilities should check applicable state and local requirements.

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

Yes. The SNF QRP continues to include the **Influenza Vaccination Coverage Among Healthcare Personnel (HCP)** measure (CMIT Measure ID #00390). The measure was finalized in the FY 2023 SNF PPS Final Rule and is reported through CDC's National Healthcare Safety Network (NHSN). See [CMS SNF QRP Measures and Technical Information](#).

IMPORTANT COVID-19 SNF QRP REPORTING UPDATE

CMS finalized removal of the COVID-19 Vaccination Coverage Among Healthcare Personnel (HCP) measure beginning with the FY 2028 SNF QRP.

SNFs are not required to submit CY 2026 HCP COVID-19 vaccination data for SNF QRP purposes. Failure to submit CY 2026 data will not result in an FY 2028 SNF QRP Annual Payment Update penalty, and CY 2026 data will not be used for SNF QRP public reporting.

The last required reporting period for the HCP COVID-19 vaccination measure was Q4 2025 (October 1-December 31, 2025). CMS will display that measure for the final time in the October 2026 Care Compare refresh, using Q4 2025 data.

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For the final rule summary, see [CMS FY 2027 SNF PPS Final Rule Fact Sheet \(July 29, 2026\)](#). For the October 2026 public reporting refresh, see [CMS SNF QRP Public Reporting](#).

If a SNF fails to submit required SNF QRP quality data for measures that remain in the program, the SNF may be subject to a two percentage point reduction in its Annual Payment Update for the applicable fiscal year.

3. Who does CMS consider HCP for the influenza vaccination measure?

For the **Influenza Vaccination Coverage Among HCP** measure, the denominator includes HCP who are physically present in the facility for at least one working day between October 1 and March 31 of the following year. For the 2026-2027 influenza season, that reporting period is October 1, 2026 through March 31, 2027.

CDC requires separate counts for three HCP categories and permits an optional fourth category:

- **Employees (required):** All persons receiving a direct paycheck from the reporting facility, regardless of clinical responsibility or patient contact.
- **Licensed independent practitioners (LIPs) (required):** Physicians, advanced practice nurses, physician assistants, and other qualifying LIPs affiliated with the facility but not directly employed by it, consistent with the CDC protocol.
- **Adult students/trainees and volunteers (required):** Adult health professional students, interns, medical residents, and volunteers affiliated with the facility but not directly employed by it, consistent with the CDC protocol.
- **Other contract personnel (optional):** Contract personnel and vendors providing care, treatment, or services who do not fall into the other denominator categories. Reporting this category is optional for the influenza measure.

Facilities must report influenza data covering the entire October 1-March 31 denominator period at least once for each reporting year. CDC encourages more frequent updates, but a single cumulative report at the end of the reporting period meets NHSN's minimum participation requirement. See the [CDC 2026 HCP Influenza Vaccination Summary Protocol](#).

COVID-19 HCP vaccination reporting is no longer required for SNF QRP purposes beginning with CY 2026. Q4 2025 was the final required reporting period for that measure. Facilities may continue to collect or report COVID-19 vaccination information for other operational, state, local, payer, or public health purposes as applicable.

4. Is reported SNF staff vaccination data publicly reported?

Yes. CMS publicly reports SNF QRP quality measure data on [Care Compare](#) and the Provider Data Catalog after giving SNFs an opportunity to review preview reports.

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The **Influenza Vaccination Coverage Among HCP** measure continues to be publicly reported. CMS's October 2026 refresh includes influenza HCP data from Q4 2025 through Q1 2026.

The **COVID-19 Vaccination Coverage Among HCP** measure will be displayed for the final time in the October 2026 refresh using Q4 2025 data. CY 2026 COVID-19 HCP data will not be used for SNF QRP public reporting. See [CMS SNF QRP Public Reporting](#).

5. Is the Federal Government providing these vaccine products for free?

There is no general federal program supplying influenza or COVID-19 vaccine product free to SNFs for staff vaccination. The federal government transitioned COVID-19 vaccine purchasing and distribution to the commercial market in fall 2023.

Depending on an individual's insurance status and local program availability, staff may be able to obtain vaccination at no cost or low cost through insurance coverage, pharmacies, employers, state or local health departments, HRSA-supported health centers, or other community programs. Availability and any fees vary.

6. How are SNF staff vaccines paid for?

Payment depends on the staff member's coverage and where the vaccine is administered.

- Most private health plans cover recommended influenza vaccination, often without cost sharing when obtained from an in-network provider. Coverage and network rules are plan-specific.
- Medicare Part B covers influenza and COVID-19 vaccines for Medicare beneficiaries without Part B deductible or coinsurance, subject to Medicare billing requirements.
- Most adults covered by Medicaid or CHIP have coverage of ACIP-recommended vaccines without cost sharing, subject to applicable program rules.
- Staff who are uninsured or underinsured may have access to no-cost or low-cost vaccination through local health departments, HRSA-supported health centers, pharmacies, employers, or other community programs; availability varies.

For current federal payment information, see CDC's [How to Pay for Vaccines](#) and the [CDC 2026-2027 Flu Season page](#).

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

Facilities can use several approaches. Billing and coverage arrangements should be confirmed with the applicable pharmacy and insurer before a clinic is scheduled.

- 1. For insured employees** - Consider arranging an onsite clinic with your LTC pharmacy or another vaccine provider. The immunizer may be able to bill the employee's health plan directly, depending on network status, enrollment, and plan requirements.

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- a. Confirm with the employee's insurer and the administering provider whether the vaccine product and administration can be billed directly and whether any cost sharing applies.
 - b. Consider encouraging employees to obtain vaccination through an in-network pharmacy or provider and establish a process to obtain acceptable documentation when vaccination status must be reported for the influenza HCP measure.
- 2. For uninsured or underinsured employees** - Consider arranging an onsite clinic and ask the vaccinating provider whether any patient assistance, public health, employer-sponsored, or community funding is available.
 - a. Refer staff to state or local health departments or [HRSA-supported health centers](#) for information about no-cost or low-cost vaccination options. Availability and fees vary.
- 3. For non-employee HCP included in the influenza measure** - Educate LIPs and adult students/trainees and volunteers about the facility's influenza reporting process and the types of documentation the facility needs. Other contract personnel are optional for the influenza HCP measure.

COVID-19 note: Facilities are not required to submit CY 2026 HCP COVID-19 vaccination data for SNF QRP purposes. If a facility continues to collect COVID-19 vaccination information for another purpose, it should clearly distinguish that activity from the retired CMS SNF QRP measure.

8. Where can I find more information on how to code and bill for COVID-19 and Influenza vaccines if I administer a vaccine to insured HCP?

Providers should contact the staff member's insurer for plan-specific coverage, network, coding, billing, and provider-enrollment requirements. A facility should not assume it can bill an employee's health plan directly unless the plan and the vaccinating provider arrangement allow it.

For Medicare beneficiaries, CMS posts current Medicare Part B vaccine codes, effective dates, and payment allowances on the [CMS Vaccine Pricing page](#). The 2026-2027 seasonal influenza and COVID-19 vaccine pricing file is available there and is updated as additional pricing information becomes available.

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#GET
VACCINATED



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

Providers can refer to the AHCA/NCAL [#GetVaccinated Toolkit](#). When using toolkit materials that discuss CMS reporting requirements, ensure they reflect the FY 2027 SNF PPS Final Rule removal of the HCP COVID-19 vaccination measure for FY 2028 and the fact that CY 2026 HCP COVID-19 data are not required for SNF QRP purposes.

KEY FEDERAL REFERENCES

- [CMS FY 2027 SNF PPS Final Rule Fact Sheet](#)
- [CMS SNF QRP Measures and Technical Information](#)
- [CMS SNF QRP Public Reporting](#)
- [CDC HCP Influenza Vaccination \(NHSN\)](#)
- [CDC 2026 HCP Influenza Vaccination Summary Protocol](#)
- [CDC How to Pay for Vaccines](#)
- [CMS Vaccine Pricing](#)