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Date: December 10, 2021 **PPL No. 21-040**

To: Local Educational Agencies (LEAs)

Subject: NOTIFICATION OF REIMBURSEMENT FOR COVID-19 VACCINATIONS
IN THE LOCAL EDUCATIONAL AGENCY MEDI-CAL BILLING OPTION
PROGRAM (LEA BOP)

This Policy and Procedure Letter (PPL) notifies Local Educational Agencies (LEAs) participating in the LEA BOP that COVID-19 vaccinations provided to Medi-Cal-enrolled students ages five through 21 are billable under the LEA BOP when rendered by qualified practitioners. The LEA BOP will reimburse for COVID-19 vaccine administration provided by registered credentialed school nurses, licensed registered nurses, certified public health nurses, certified nurse practitioners (hereinafter referred to as “nurses”), and licensed vocational nurses (LVNs) that are under the supervision of a physician.¹

COVID-19 vaccines are free of charge to Medi-Cal beneficiaries. If the student receiving the vaccination is enrolled in Medi-Cal on the date of service, the time spent vaccinating the student may be billed when consent to vaccinate is provided by a parent/guardian in cases where the Medi-Cal student is under 18 years old. COVID-19 vaccines are considered covered EPSDT services that are authorized under the Bright Futures Recommendations for Preventive Pediatric Health Care. An Individualized Education Program (IEP), Individualized Family Service Plan (IFSP), Individualized Health and Support Plan (IHSP) or other care plan **is not required** to bill for administration of a COVID-19 vaccine. Immunizations are covered services under the Bright Futures periodicity schedule when recommended by the Advisory Committee on Immunization Practices (ACIP). At this time, the ACIP recommends the Pfizer-BioNTech (Pfizer) COVID-19 vaccine be administered to those ages five and older and the Moderna and Johnson and Johnson for those ages 18 and older.²

Time spent administering a COVID-19 vaccine must meet a 15-minute time threshold in order to bill one unit of service through the LEA BOP. However, the following

¹ A LVN acting under the direction of a physician may perform immunization techniques, including administration by hypodermic injection, provided that such administration is upon the standing orders of a supervising physician. See Business & Professions Code §§ 2860.5 (a), 2860.7 (a).

² <https://www.cdc.gov/vaccines/hcp/acip-recs/vacc-specific/covid-19.html>

components may be included to meet the required 15-minute increment to bill one unit of service:

- Preparation activities prior to the administration of the vaccine (e.g., reviewing documents to ensure they are complete, screening recipients for contraindications and precautions, and confirming consent was provided to vaccinate a Medi-Cal student ages 5 through 17);
- Administration of the vaccine, including gathering supplies and performing hand and injection site hygiene; and
- Follow-up activities conducted after the administration of the vaccine (e.g., documenting the service, completing the vaccination card, and observing the beneficiary for possible adverse health events).

Effective Dates of COVID-19 Vaccine Administration Reimbursement

Ages 5 through 11:

On October 29, 2021, the Pfizer COVID-19 vaccine was approved for emergency use in children ages 5 through 11 years old. The Pfizer vaccine is a two-dose series, with doses given 21 days apart. Both doses separately qualify for reimbursement under the LEA BOP.

Ages 12 through 17:

The Pfizer vaccine was approved for emergency use authorization in youth ages 12 through 15 on May 10, 2021. Prior to that, the Pfizer vaccine was approved for emergency use authorization in youth ages 16 through 17 on December 11, 2020. The Pfizer vaccine is a two-dose series, with doses given 21 days apart. Both doses separately qualify for LEA BOP reimbursement.³

Ages 18 through 21:

Adults ages 18 through 21 may receive doses from one of three manufacturers: Pfizer (approved December 11, 2020), Moderna (approved December 18, 2020), or Johnson & Johnson's Janssen vaccine (approved February 27, 2021). The Pfizer and Moderna vaccines are each a two-dose series, with a third booster dose recommended six-months after the primary two-dose series.⁴ All three doses are eligible for LEA BOP

³ A one-dose booster shot for youth ages 16-17 who initially received the Pfizer vaccine was approved by the Food and Drug Administration (FDA) for emergency use on December 9, 2021.

⁴ A one-dose booster shot for immunocompromised adults that initially received the Pfizer vaccine was approved by the FDA for emergency use on August 12, 2021 and later amended to include additional certain populations on September 24, 2021. On

reimbursement. The Johnson & Johnson vaccine is a one dose vaccine and may be followed by one booster dose of any brand of COVID-19 vaccine at least two months after the initial vaccine was administered⁵. Both the initial Johnson & Johnson vaccine and the booster vaccine are eligible for LEA BOP reimbursement.

Billing for COVID-19 Vaccine Administration

COVID-19 vaccine administration is billed as a LEA BOP treatment service. The following procedure codes will be used when billing the LEA BOP for administration of the COVID-19 vaccine:

Practitioner	Procedure Code	Practitioner Modifier
Nurses	T1002	none
Licensed Vocational Nurses	T1003	none

Non-Billable Components of COVID-19 Vaccine Administration

The service time associated with activities such as obtaining the vaccinations or procuring vaccine administration or storage supplies is not billable under the LEA BOP. In addition, time spent inventorying vaccines or organizing supplies is not a billable service. Time spent on these administrative activities may **not** be included to meet a billable 15-minute increment.

Nothing stated in this PPL shall supersede any state or federal regulations or statutes. Any updates to Vaccine and Booster Guidance will be addressed in future PPLs.

If you have any questions concerning this PPL, please contact the LEA Medi-Cal Billing Option Program by e-mail at LEA@dhcs.ca.gov.

November 19, 2021, the FDA approved a one-dose booster shot for emergency use for all adults age 18 and older for both the Moderna and Pfizer COVID-19 vaccines. (<https://www.fda.gov/emergency-preparedness-and-response/counterterrorism-and-emerging-threats/coronavirus-disease-2019-covid-19>)

⁵ A one-dose booster shot is recommended for all adults that initially received the Johnson & Johnson vaccine. The booster shot was approved for emergency use by the FDA on October 20, 2021. (<https://www.fda.gov/emergency-preparedness-and-response/counterterrorism-and-emerging-threats/coronavirus-disease-2019-covid-19>)

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Sincerely,

ORIGINAL SIGNED BY JILLIAN MONGETTA

Jillian Mongetta, Chief

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