



MICHELLE BAASS
DIRECTOR

State of California—Health and Human Services Agency
Department of Health Care Services



GAVIN NEWSOM
GOVERNOR

Date: March 3, 2022

PPL No. 22-006

To: Local Educational Agencies (LEAs)

Subject: NOTIFICATION OF REIMBURSEMENT FOR VACCINE
ADMINISTRATION AND VACCINE COUNSELING 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 immunizing Medi-Cal-enrolled students ages 21 and under is a billable service under the LEA BOP. Billable components include both the time spent to administer vaccines to Medi-Cal enrolled students and the time spent providing vaccine counseling services to Medi-Cal enrolled students and/or their families.

1. Vaccine Administration

The LEA BOP will reimburse for vaccine administration provided by physicians, physician assistants, 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 If the student receiving a 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. Immunizations are considered covered Early and Periodic Screening, Diagnostic and Treatment (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 vaccine. Immunizations are covered services under the Bright Futures periodicity schedule when recommended by the [Advisory Committee on Immunization Practices \(ACIP\)](#). Recommended vaccines for children and adolescents age 18 and younger can be found [here](#). Recommended vaccines for adults 19 and over can be found [here](#).

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).

Billable Components Related to Vaccine Administration

Time spent administering a vaccine must meet a 15-minute time threshold in order to bill one unit of service through the LEA BOP. However, the following 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 under the age of 18);
- 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 vaccination records, and observing the beneficiary for possible adverse health events).

Non-Billable Components Related to 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.

Generally, the LEA BOP does not reimburse for the vaccine itself, since vaccines can be obtained through the [Vaccines for Children \(VFC\) Program](#) for Medi-Cal enrolled students. The VFC Program, administered by the California Department of Public Health, provides vaccines at no cost to providers who serve eligible children. [Click here](#) to learn more about participating in the VFC Program.

Billing for Vaccine Administration

Vaccine administration is billed as a LEA BOP treatment service when the vaccine is administered by a nurse or an LVN. The following procedure codes will be used when billing the LEA BOP for administration of a vaccine by these practitioners:

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

Since physicians and physician assistants do not bill for nursing-related treatment services, vaccine administration will be billed as a health assessment when the vaccine is administered by either of these practitioners:

| Practitioner | Procedure Code | Practitioner Modifier |
|----------------------|----------------|-----------------------|
| Physicians | 96156 | AG |
| Physician Assistants | 96156 | U7 |

2. Vaccine Counseling

Vaccine counseling services are a billable LEA BOP service under the EPSDT benefit. This benefit includes education to address parental concerns and questions regarding vaccines to address anxiety and misinformation. As of December 2, 2021, stand-alone vaccine counseling visits related to all pediatric vaccines will be covered under the health education/anticipatory guidance service for LEA BOP. Vaccine counseling must be provided separately from the actual delivery of a vaccine.

Note: Details on billing for COVID-19 vaccine counseling will be provided under a separate PPL. At this time, DHCS requests that LEAs hold all COVID-19 vaccine counseling service claims until the system updates are implemented, which will identify that the counseling was specific to the COVID-19 vaccine.

Billable Components Related to Vaccine Counseling

Time spent counseling and educating the Medi-Cal student and/or parent/guardian must meet a 15-minute time threshold in order to bill one unit of service through the LEA BOP. However, the following components may be included to meet the required 15-minute increment to bill one unit of service:

- Discussing vaccine hesitancy and advocating for the protection of the child and community;
- Discussing potential side effects, including concerns regarding pain;
- Providing reassurance on vaccine safety;
- Answering commonly asked questions on benefits, safety, and immunologic aspects of vaccines;
- Providing resources to parents and guardians, and;
- Obtaining consent to vaccinate when the student is under 18 years of age.

Billing for Vaccine Counseling

The following procedure code and modifiers will be used when billing the LEA BOP for vaccine counseling services:

| Practitioner | Procedure Code | Practitioner Modifier |
|---|----------------|-----------------------|
| Physicians | 99401 | AG |
| Physician Assistants | 99401 | U7 |
| Nurses | 99401 | TD |
| Psychologists | 99401 | AH |
| Social Workers | 99401 | AJ |
| Marriage and Family Therapists and Credentialed School Counselors | 99401 | <i>(no modifier)</i> |

Note that billing for health education/anticipatory guidance is limited to four units per student, per day.

Authorization Requirements for Vaccine Administration and Counseling Services

Since immunizations are considered covered EPSDT services that are authorized under the Bright Futures Recommendations for Preventive Pediatric Health Care, the National Provider Identifier (NPI) number of an ORP practitioner is **not** required on claims related to vaccine administration. Claims billed under CPT codes T1002, T1003 and 96156 will not deny when submitted without the NPI of an ORP practitioner. The Bright Futures Recommendations for Preventative Pediatric Health Care will be considered the authorization for the service.

Similarly, claims billed for vaccine counseling services are authorized by the Bright Futures Recommendations for Preventative Pediatric Health Care when the vaccine being discussed is included on the ACIP list of recommended vaccines. Claims billed under CPT codes 99401 do not require an NPI of an ORP practitioner.

Nothing stated in this PPL shall supersede any state or federal regulations or statutes.

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.

Sincerely,

ORIGINAL SIGNED BY BRIAN FITZGERALD

Brian Fitzgerald, Division Chief
Local Governmental Financing Division
Department of Health Care Services