

State of Alaska Response to Comments Received During Tribal Consultation on the Proposed Vaccine Product and Administration State Plan Amendment

| Number | Source | Comment   | State Response   |
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| 1      | ANHB   | Overall, we believe these changes are positive. We support the changes which recognize pharmacists as independent practitioners to administer vaccines under the Medicaid Program. This is an important change that will allow for wider delivery of seasonal influenza and other routine vaccines to AN/AI patients. While the inclusion of pharmacists in Medicaid vaccine administration is appreciated, we believe that the list of covered providers who are permitted to administer and be reimbursed for vaccine services does not fully recognize the difficulties of administering vaccines in remote communities. | <p>The Department appreciates the Alaska Native Health Board (ANHB) comments raising the issue of reimbursement for vaccination product and administration by practitioners outside those delineated in the tribal consultation letter.</p> <p>In alignment with the proposed regulations, the intent of the vaccine coverage SPA was to update the existing list of providers who are subject to RBRVS payment methodology and who can be reimbursed for vaccine products and the administration of vaccines.</p> |
| 2      | ANHB   | Under the proposed changes, only physicians, advanced practice registered nurses (APRN), physician assistants (PA), and pharmacists are listed reimbursable provider types for this Medicaid provision. We seek clarification from the Department if registered nurses (RN), licensed practical nurses (LPN), certified medical assistants (CMA), and community health aids (CHA) are also reimbursable for the administration of covered vaccines under this proposed Medicaid SPA.  | <p>There was no intent to eliminate coverage for vaccines administered by a rendering only provider or a support staff member, within the scope of the individual's license or certification. The department will revisit the presentation of these changes to ensure that no unintended restrictions occur.</p>   |
| 3      | ANHB   | If the services of these support staff and physician extenders are not reimbursable under these changes, we urge the Department to add them as covered provider types. If vaccine administration by these personnel is not covered, many providers will have no real choice but to use upper level health care professionals to administer vaccines, even though using them is not medically necessary and would place a needless strain on a health care system that suffers from an extreme shortage of qualified health professionals, being made worse by COVID-19 fears.   | <p>Please see responses in #1 and #2 above.</p>  |

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| 4 | ANHB | Further, if physicians, APRNs, PAs, and pharmacists are the only reimbursable provider types for vaccine administration, it will severely limit the timely and cost-effective administration of these life-saving vaccines in the many communities that lack those practitioners. In the Alaska Tribal Health System (ATHS), the primary health care professional available in our remote and frontier clinics is the CHA; in the regular course of their work, CHAs already administer many vaccines. It is important that CHAs are covered for these vaccine services under Medicaid to meet the cost of delivering these services in our state’s remote communities to Medicaid beneficiaries. | Please see responses in #1 and #2 above.   |
| 5 | ANHB | The geographic challenges of wide-spread vaccine administration in Alaska cannot be overstated; and they arise at every step along the way, from the planning process, to shipment of vaccine doses, to maintenance of vaccines on site, to administration.   | Please see responses in #1 and #2 above.   |
| 6 | ANHB | As we think ahead to how we will deliver a statewide, COVID-19 vaccine in a timely and cost-effective manner, it is essential that we take full advantage of all available health care personnel, and that Medicaid reimburse for vaccine administration by any health care worker acting within the scope of their licensed or certified practice.   | Please see responses in #1 and #2 above.   |
| 7 | ANHB | In closing, we believe that these changes to Medicaid vaccine coverage and reimbursement are positive, but we urge the state to clearly include health care personnel such as RNs, LPNs, CMAs, and CHAs as covered providers for the purposes of these changes. The coverage of provider support staff and physician extenders is crucial for the ATHS, but we believe it is also important for non-tribal providers, which also rely on those personnel to administer the vast majority of vaccines. The Department should ensure these changes accurately reflect health care practice on the ground.   | Thank you for calling attention to the lack of clarity in the tribal consultation letter on the proposed vaccination product and administrative SPA. Vaccination services performed by rendering providers under the umbrella of physician services retain eligibility for reimbursement as is the case currently. |