

Pharmaceutical Supply and Payment Chain Coalition

Joint Recommendations to the Centers for Medicare & Medicaid Services for Medicare Advantage Enrollees Seeking COVID-19 Vaccines without Their Original Medicare Cards

Background: Information on CMS' website ("Medicare Billing for COVID-19 Vaccine Shot Administration," <https://www.cms.gov/medicare/covid-19/medicare-billing-covid-19-vaccine-shot-administration>) instructs Medicare Advantage (MA) Plan (Part C) enrollees to bring their Original Medicare card ("red, white, and blue card") with them to their COVID-19 vaccine appointment. CMS instructs vaccine administrators to use patients' Medicare Beneficiary Identifier (MBI), which is located on the Original Medicare card, to bill Original Medicare. Some MA enrollees, however, may not understand the difference between their MA Plan card and their Original Medicare card or, even if they do, they may not know the location of their Original Medicare card (since they use their MA Plan card to access care).

Because Original Medicare is covering all COVID-19 vaccines this year, providers and others administering the vaccine need certain information to submit a claim and this is why Original Medicare cards are required. We are also cognizant of the large task these providers are being asked to undertake, and wary of imposing any additional burden.

Recommendations: To help ameliorate confusion and provide clarity, the Pharmaceutical Supply and Payment Chain Coalition:

1. Appreciates CMS' inclusion within its "Medicare Billing for COVID-19 Vaccine Shot Administration" instructions for vaccine administrators for looking up patients' MBI using the provider's MAC secure portal (<https://www.cms.gov/Medicare/New-Medicare-Card/Providers/MACs-Provider-Portals-by-State.pdf>). We also appreciate the instruction for what data providers must collect from patients to use the look-up tool and the recognition that this tool can be used for patients enrolled in MA Plans.
2. Recommends CMS reiterate this clear guidance to all administration sites/providers.
3. Recommends CMS instruct MACs to educate providers on use of their look-up tools and provide any assistance necessary to ensure vaccine administration is accurately reimbursed and entered into the COVAX portal.
4. Recommends CMS evaluate the extent of beneficiary and provider abrasion in securing vaccine (e.g., number of cases, report of cases by provider type, etc.) and identify other solutions, as needed.

Signatory Coalition Member Organizations:

Academy of Managed Care Pharmacy (AMCP)
America's Health Insurance Plans (AHIP)
Biotechnology Innovation Organization (BIO)
Blue Cross Blue Shield Association (BCBSA)
FMI – the Food Industry Association
National Grocers Association (NGA)
Pharmaceutical Care Management Association (PCMA)