

Georgia Vaccines for Children (VFC) Provider Agreement Policy

This document shall serve as the Georgia Department of Community Health (DCH), Division of Public Health (DPH) Immunization Office's policy for program compliance. Non-compliance is defined as any intentional deviation from the signed Provider Agreement with the Georgia Vaccines for Children (VFC) Program. Each VFC enrolled provider is required to sign a Provider Agreement stating that they agree to the following conditions:

Provider Requirements

- 1. Vaccine supplied by Georgia Immunization Office will be administered only to a child ≤ 18 years of age who:**
 - a) Is enrolled in Medicaid (or qualifies through a Medicaid waiver).**
 - b) Has no health insurance (uninsured).**
 - c) Is American Indian or an Alaska Native.**
 - d) Has health insurance that does not pay for the vaccine (underinsured).**
 - e) Is enrolled in the PeachCare for Kids Program.**

Definitions for VFC eligible children:

- a) Medicaid – has a current Medicaid card or Medicaid waiver at the time of service.
- b) Uninsured - has no health insurance.
- c) American Indian/Alaska Native – self-reported by the patient.
- d) Underinsured - has insurance but vaccines are not a covered benefit.
 - Example: An insurance company may not cover certain immunizations, such as the pneumococcal conjugate vaccine. The child will qualify for VFC for that particular vaccine.
 - Example: An insurance company may cover immunizations up to a certain age. Until that age, the child is fully insured. After that age, the child is considered underinsured (has insurance, but vaccines are not a covered benefit).
 - Example: An insurance company may only provide \$100 per year to cover the costs of immunizations. The child is fully insured up to \$100. Once this amount is exhausted, the child is then eligible to receive VFC vaccine.
- e) PeachCare for Kids – has a current PeachCare for Kids card at the time of service.

Program Violations

- a) A provider administers vaccine to patients who are > 18 years of age.
- b) A provider fails to purchase private stock vaccine for patients whose insurance covers immunizations and gives every patient in the practice VFC vaccine regardless of eligibility.
- c) A provider administers VFC vaccine to a child then bills the child's insurance for the cost of the vaccine.
- d) A provider administers VFC vaccine because the insurance company's reimbursement rate is low.

- Example: An insurance company's reimbursement rate for a particular vaccine may be \$55 per dose; however, the vaccine may actually cost \$58 per dose. The child does not qualify for VFC vaccine because immunizations are a covered benefit. Reimbursement rates are not a consideration when determining VFC eligibility. The child is still considered to be fully insured and privately purchased vaccine must be administered.
- e) A provider administers VFC vaccine to a child even though the insurance company provides a flat rate of coverage for the year.
 - Example: An insurance company may only provide \$100 per year to cover the costs of immunizations. Privately purchased vaccine should be administered up the \$100. Once this amount is exhausted, the child is then eligible to receive VFC vaccine.
 - f) A provider administers VFC vaccine to a child who has private insurance with a high deductible.
 - Example: Parent has a policy with a \$1,000 deductible. The child is still considered fully insured and privately purchased vaccine should be administered.
 - g) A provider charges the patient for the cost of the vaccine.
 - h) A provider charges a fee to a Medicaid recipient.
 - i) A provider violates applicable laws, rules, regulations, or policies.

These examples should not be considered all-inclusive.

Actions

- a) Educational training and follow-up visits will be conducted by a Georgia Immunization Office Representative.
- b) Vaccine shipments will be suspended until VFC vaccine is replaced by the provider. **See Appendix A, Georgia Vaccines for Children (VFC) Vaccine Loss Policy.**
- c) More than three (3) program violations (of the same type or a combination of types) will result in termination from the VFC Program.

- 2. Assess patient eligibility status during the initial visit for each patient receiving vaccines provided by the VFC Program. Subsequent screenings will be conducted to determine whether the child's VFC eligibility status has changed. Eligibility Screening Records will be maintained for a period of three (3) years. If requested, the records will be made available to the Georgia Department of Community Health (DCH) or the United States Department of Health and Human Services (DHHS).**

Program Violations

- a) Failure to maintain records of patient eligibility for at least three years.
- b) Failure to share records with DCH or DHHS.

Actions

- a) Educational training and follow-up visits will be conducted by a Georgia Immunization Program Consultant (IPC).
- b) More than three (3) program violations (of the same type or a combination of types) will result in termination from the VFC Program.

- 3. Participate in a VFC site visit conducted by an Immunization Program Consultant at least once every two years as measured from the date of the enrollment in the VFC Program of the practice named below.**

Program Violations

Provider does not allow a site visit.

Actions

- If a site visit is not allowed within 60 days of request, a provider will be terminated and any remaining vaccines removed.
- Additional time may be allowed due to justifiable and extenuating circumstances.
- More than three (3) program violations (of the same type or a combination of types) will result in termination from the VFC Program.

- 4. Participate in an assessment of my practice's immunization levels using the Comprehensive Clinical Assessment Software Application (CoCASA) at least once every two years.**

Program Violation

Provider does not allow a CoCASA assessment.

Actions

- If a CoCASA assessment is not allowed within 60 days of request, a provider will be terminated and any remaining vaccines removed.
- Additional time may be allowed due to justifiable and extenuating circumstances.
- More than three (3) program violations (of the same type or a combination of types) will result in termination from the VFC Program

- 5. Comply with the appropriate immunization schedule, dosage, and contraindications that are established by the DHHS Advisory Committee on Immunization Practices (ACIP) unless (a) in making a medical judgment in accordance with accepted medical practice, the practitioner deems such compliance to be medically inappropriate or (b) the particular requirement is not in compliance with state law(s) including laws relating to religious or other exemptions.**

Program Violations

- Inappropriate administration of vaccine.
 - Example: Mixing two vaccines in the same syringe (i.e., MMR and DTaP) for the purpose of reducing the number of injections needed.
 - Example: Administering pneumococcal conjugate vaccine to a 12 year old, when VFC guidelines allow for administration to children less than 5 years of age.
- Non-compliance with ACIP recommendations for age and dose intervals.
 - Example: Administering vaccines before the proper age (i.e., vaccinating a child with MMR and Varicella vaccine before the age of one year).
- Provider fails to assess for immunization status and immunize children at the time they are seen.

- Example: Provider sees child for well-child visits but does not review immunization status and/or simply refers child to another facility for immunizations.
- Example: Provider sees child for sick visit but does not review immunization status to be administered once child is well.

Actions

- a) Mandatory participation in educational training provided by a Georgia IPC.
- b) More than three (3) program violations (of the same type or a combination of types) will result in termination from the VFC Program.
- c) Any provider who does not administer at least one vaccine in a six-month period of time will be terminated and any remaining vaccines removed.

6. Provide Vaccine Information Statements and maintain records in accordance with the National Childhood Vaccine Injury Act (NCVIA), which includes reporting clinically significant adverse events to the Vaccine Adverse Event Reporting System (VAERS).

Program Violation

Failure to provide and document distribution of current Vaccine Information Statements to patients.

Actions

- a) Educational training and follow-up visits will be conducted by a Georgia IPC.
- b) More than three (3) program violations (of the same type or a combination of types) will result in termination from the VFC Program.

7. Not impose a charge for the cost of the vaccine.

Program Violation

Imposing a charge for the cost of vaccine.

- Example: An office visit fee and administration fee can be charged to the patient, but a fee **cannot** be charged for the cost of the vaccine.

Actions

- a) Educational training and follow-up visits will be conducted by a Georgia IPC.
- b) More than three (3) program violations (of the same type or a combination of types) will result in termination from the VFC Program.

8. Not impose a charge to the patient for administration of the vaccine in any amount higher than the current state fee cap of \$14.81 per injection. (Your practice may charge less than \$14.81 per injection).

Program Violation

Imposing a charge greater than \$14.81 per injection.

Actions

- a) Educational Training and follow-up visits will be conducted by a Georgia IPC.

- b) More than three (3) program violations (of the same type or a combination of types) will result in termination from the VFC Program.

9. Not deny administration of a VFC supplied vaccine to a VFC eligible child due to the inability of the child's parent/guardian/individual of record to pay an administration fee. If the parent/guardian/individual of record is unable to pay, the administration fee must be waived. Other visit or office fees may be charged as applicable.

Program Violations

- a) Denying vaccine to a VFC eligible child due to inability to pay.
- b) Denying a child/parent/guardian access to vaccine administration records due to an outstanding bill on the part of the parent/guardian.
- c) Carrying a balance for unpaid administration fees.

Actions

- a) Educational training and follow-up visits will be conducted by a Georgia IPC.
- b) More than three (3) program violations (of the same type or a combination of types) will result in termination from the VFC Program.

10. Comply with the DCH's requirements for ordering vaccine, for reporting vaccine usage, spoilage, expiration and physical inventories, and all other requirements as outlined on the monthly reporting forms.

Program Violation

- a) Failure to submit a monthly comprehensive report detailing vaccine usage, inventory, expiration, and spoilage on a monthly basis.

Actions

- a) Educational training and follow-up visits will be conducted by a Georgia IPC.
- b) Non-reporting of vaccine usage, inventory, expired, spoiled, and returned vaccine may result in termination from the VFC Program. **See Appendix A, Georgia Vaccines for Children (VFC) Vaccine Loss Policy.**
- c) More than three (3) program violations (of the same type or a combination of types) will result in termination from the VFC Program.

11. Not prohibited by Georgia law (i.e., O.C.G.A. Chapters 43-34, 26-4, and 16-13) or any other applicable law from possessing dangerous drugs (i.e., vaccines).

Program Violations

- a) Drug Enforcement Agency number has been revoked.
- b) License to practice medicine has been revoked, suspended, or annulled.
- c) Failure to report changes in license status.

Action

- a) Immediate termination from the VFC Program

- 12. Accept the responsibility of maintaining the integrity of the drugs (i.e., vaccines) in accordance with all laws, regulations, and VFC program recommendations pertaining to vaccine storage and handling procedures.**

Program Violations

- a) Failure to properly store vaccine in accordance with CDC guidelines. As of January 1, 2010, VFC-supplied vaccines may not be stored in a dorm-style refrigerator, even for short periods of time. VFC-supplied vaccines must be moved to a CDC-approved storage unit (stand alone refrigerator or freezer unit; household style unit with separate refrigerator and freezer doors). **See Appendix A, Georgia Vaccines for Children (VFC) Vaccine Loss Policy.**
- b) Failure to identify primary and backup staff members responsible for vaccine storage and handling.
- c) Failure to document temperatures twice daily.
- d) Failure to complete and utilize the Vaccine Disaster Recovery Plan.

Actions

- a) Educational training and follow-up visits will be conducted by Georgia IPC.
- b) As of January 1, 2010 providers storing vaccine in a dorm-style refrigerator will have vaccine shipment suspended until vaccines are moved to an approved unit.
- c) Vaccine replacement by provider. **See Appendix A, Georgia Vaccines for Children (VFC) Vaccine Loss Policy.**
- d) May result in termination from the program.
- e) More than three (3) program violations (of the same type or a combination of types) will result in termination from the VFC Program.

- 13. Complete and submit to the VFC office the annual Provider Profile Update within 30 days of receipt. Failure to submit this update can lead to deactivation from the VFC program.**

- 14. Comply will all requirements of VFC's Vaccine Tracking System (VTrckS). VTrckS will replace VACMAN, the current CDC software.**

- a) **Should the practitioner, staff or representatives of the facility or practitioner named below access VTrckS, each user agrees to be bound by CDC's terms of use for interacting with the online ordering system. Each user further agrees to be bound by any applicable federal laws, regulations, or guidelines related to accessing a CDC system and ordering publically funded vaccines.**
- b) **Upon execution of this contract, the name of each member of the facility or practitioner's staff or any person representing the facility or practitioner that will access VTrckS to order vaccines on behalf of the practitioner or facility will be submitted to DCH. In addition, the practitioner or facility will maintain a record of each staff member authorized to order vaccines on behalf of the practitioner or facility. The practitioner or facility will designate a contact person responsible for informing the CDC of changes in the status of current staff members or representatives who are no longer authorized to order vaccines, or the addition of**

any new staff authorized to order on behalf of the practitioner or facility within 24 hours of such change.

Program Violations

- a) Provider fails to designate primary and backup staff members responsible for vaccine management in VTrckS.
- b) Provider fails to notify CDC and VFC of staff changes within 24 hours.

Actions

- a) Vaccine shipments may be suspended until a new staff person has been certified.
- b) May result in termination from the program.

15. Pursuant to O.C.G.A. §31-12-3, the vaccination data for every dose of vaccine administered by the clinic will be entered into the Georgia Registry of Immunization Transactions and Services (GRITS) within ten (10) business days of the service being rendered. See Appendix B, Georgia Immunization Registry Law – O.C.G.A. §31-12-3.1.

Program Violation

- a) Provider fails to submit vaccination data within 10 business days.

Actions

- a) Provider orders may be suspended until all vaccination data has been entered into GRITS.
- b) More than three (3) program violations (of the same type or a combination of types) will result in termination from the VFC Program.

16. Understand that this agreement may be terminated by either party at any time for any reason. DCH has the discretion to terminate this agreement for convenience or for failure of the provider to comply with any of the requirements.

- a) Termination by either party must be in writing.
- b) The clinic will contact GIO to schedule delivery of any remaining vaccines.
- c) If the practitioner or facility terminates the agreement, the practitioner or facility will notify VFC for vaccine pickup.
- d) If DCH terminates, GIO staff will contact the provider to arrange for vaccine pickup.