
POLICY CLARIFICATION #PC000290

COVID 19 VACCINE ADMINISTRATION CARVE OUT INVOICE RUNOUT TIME PERIOD

December 20, 2024

To: Iowa Medicaid Managed Care Plans

This letter is a formal notification of the state's expectations related to the operations and implementation of Iowa Medicaid under the managed care program. This purpose of this letter is to do following:

- Provide formal guidance
- Clarification of existing Iowa Medicaid policy
- Guidance on new process or policy
- Request for information

This purpose of this letter is to provide formal guidance and clarification related to current Managed Care Plan contracts for the Covid 19 Vaccine Administration Carve-Out invoice runout period.

Current Managed Care Plan (MCP) contracts provide the following guidance and expectation related to the Covid Carve Out invoice run out period:

Exhibit G: Pandemic-Related Contract Provisions

COVID 19 Vaccination Administration Carve-Out.

The Agency will exclude from the capitation rates the costs associated with COVID 19 vaccine administration services. Contractor shall continue to provide coverage for COVID 19 vaccine administration services. The Agency will reimburse the Contractor on a retrospective basis for such claims using the Medicare payment methodology and

rates for the same services and consistent with CMS guidance and Agency policy as published in any and all provider informational letters (IL).

However, payments to Contractor under this provision shall be limited to the lower of (1) what Medicare would have paid for the same services for a Medicare eligible individual and consistent with all published ILs, or (2) the Contractor's actual out-of-pocket payments for such services. Per CMS guidelines, this COVID 19 Vaccination Administration Carve-Out ends on September 30, 2024. After this end date, costs associated with COVID vaccine administration services are included in the capitation rates. Invoice runout periods will be set at the discretion of the agency and will be communicated to the contractor via policy clarification.

Effective immediately, the following guidance and clarification is being provided:

1. The runout period for COVID-19 Vaccine Administration Carve-Out invoices for Q1 SFY2025 will be 90 days from the end of the COVID-19 Carve-Out on September 30, 2024. Final invoices must be submitted to Iowa Medicaid no later than 5pm on January 7, 2025.
2. MCPs shall adhere to existing invoice and file layout procedures. (The current SOP and file layout can be located in IMPA: IMPA>Resource Library>Current Project Operations
3. The COVID-19 Vaccine Administration Carve-Out invoice runout time period will end on December 31, 2024. After this date, no additional invoice files we be accepted for processing or payment. This date is the deadline for the last file submission for Q1 SFY2025.

Related Policy Clarifications:

This policy clarification should be used in correlation with the following policy clarifications:

This formal guidance impacts capitation rates in the following manner:

- This [is was] an Iowa Medicaid practice prior to April 1, 2016 and was included in the experience used to develop the capitation rates.
- This is a new process or policy that does not have a fiscal impact.
- This is a new process or policy that is in effect immediately.