

Comments and Responses on ARC 9940B
Conditions for Medicaid Payment for VFC-Covered Vaccines
Received January 17, 2012

The following persons and organizations provided written comments, which are included in the summary below:

Tony Bassett, clinic manager, Mercy Pediatric Clinics, Des Moines
Jill Groth, director of clinic operations, Covenant Clinic, Wheaton Franciscan Healthcare

COMMENT: Does the depletion of stock need to be with the VFC program office or our individual offices as we experience this on a month to month basis when our orders are not completely filled? What documentation will be needed for proof? (Bassett)

RESPONSE: No. This is for the times that the Iowa Department of Public Health (IDPH) runs out of VFC stock and notifies DHS that the state is out of stock. The IDPH will determine when a situation exists that Medicaid will have to reimburse for the vaccine.

COMMENT: Please consider approval for direct billing to Medicaid when VFC supply is depleted. Operationally, it is very time consuming for nursing and billing staff to keep track of what we've borrowed from private stock and unfair to the Medipass enrolled children of the state to not receive the vaccines they need in a timely fashion because VFC is unable to secure enough inventory to meet their needs, when privately paid children through their insurance plans almost never have inventory-related delays in receiving the vaccines they need. (Groth)

RESPONSE: This comment will be provided to IDPH as a concern related to the efficiency of the administration of the VFC program and the need to order sufficient quantities of vaccine to meet the needs of Iowa's children.