BACKGROUND: The Biden-Harris Administration provided free access to COVID-19 vaccines for every adult living in the United States. Accordingly, the Health Resources and Services Administration’s (HRSA) COVID-19 Coverage Assistance Fund (CAF) did cover the costs of administering COVID-19 vaccines to patients whose health insurance doesn’t cover vaccine administration fees or does but typically has patient cost-sharing.

Patients cannot be billed directly for COVID-19 vaccine fees or costs to health care providers, for administering COVID-19 vaccines to underinsured patients that were previously fully covered through CAF.

IMPORTANT: The HRSA COVID-19 Coverage Assistance Fund (CAF) stopped accepting claims for vaccine administration at 11:59 p.m. on April 5, 2022 due to a lack of sufficient funds.

Requirements for COVID-19 Vaccination Program Providers

All organizations and providers participating in the CDC COVID-19 Vaccination Program:

- Must administer COVID-19 Vaccine at no out-of-pocket cost to the recipient
- May not deny anyone a vaccination based on the vaccine recipient’s coverage status or network status
- May not charge an office visit or other fee if COVID-19 vaccination is the sole medical service provided
- May not require additional medical services to receive COVID-19 vaccination
- May seek appropriate reimbursement from a program or plan that covers COVID-19 Vaccine administration fees for the vaccine recipient, such as:
  - Vaccine recipient’s private insurance company
  - Medicare or Medicaid reimbursement
• May not seek any reimbursement, including through balance billing, from the vaccine recipient

The HRSA page was updated as of June 1, 2022,

COVID-19 Vaccination Provider Requirements and Support | CDC

IMPORTANT: Patients, who may have been charged, in error, for COVID-19 vaccination services (cost-of-vaccine, admin fee, office fee, co-pay, etc.) MUST be refunded.

Trinity Health COVID-19 Registration Protocols:

COVID-19 Registration Protocols 04.28.22.docx

Additional Information

PBS- F and PBS-K (Professional Billing Services) both have identified work queues that create safeguards and ensure that patients will not be billed for COVID-19 Vaccines & COVID-19 Vaccine Administration in adherence to federal regulations. These safeguards allow for manual evaluation and write-offs to occur based upon identified COVID-19 administration codes.