



CENTER FOR MEDICARE

TO: All Medicare Advantage Organizations (MAOs), Prescription Drug Plan (PDP) Sponsors, and Medicare-Medicaid Plans (MMPs)

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SUBJECT: Access to COVID-19 Vaccine Data for Parts C & D Enrollees

DATE: January 7, 2021

The Centers for Medicare & Medicaid Services (CMS) will process all claims for payment for COVID-19 vaccine (COVAX) administration for the vast majority of Medicare beneficiaries¹ through the original fee-for-service Medicare program. For Calendar Years 2020 and 2021, this will include claims for COVAX administration for Medicare beneficiaries enrolled in Medicare Advantage (MA) Plans (including Local Coordinated Care Plans (CCPs), and Regional CCPs as well as other plan types), Prescription Drug Plans (PDPs) and Medicare-Medicaid Plans (MMPs), collectively referred to in this memorandum as “plans.” While none of these plans will be responsible for making payments for vaccine administration during this time, CMS encourages these plans to help ensure their enrollees receive an initial COVAX dose when available to them, as well as any second dose per clinical recommendations.

In order to assist with these efforts, CMS will allow plans to request certain COVAX data² from CMS regarding their enrollees, subject to CMS approval, if that data is the minimum necessary and is requested for the plans’ health care operations such as case management, care coordination, or population-based activities to improve the health of their enrollees. The purpose of this memo is to explain how CMS will make certain COVAX data available to plans for their enrollees. These data will be offered via two paths: 1) a new ABII-COVAX Web Portal (ABII-COVAX) to be hosted by CMS contractor Acumen, LLC (Acumen), and 2) through CMS’

¹ As explained in the Interim Final Rule “Additional Policy and Regulatory Revisions in Response to the COVID-19 Public Health Emergency” (CMS-9912-IFC), which appeared in the Federal Register on November 6, 2020, enrollees in Section 1876 Cost Plans will be covered for COVAX administration by the Section 1876 Cost Plan when COVAX is administered in-network. 85 FR 71142, 71148.

² This data will include information needed for the plan to identify the beneficiary (name, Medicare Beneficiary Identifier, date of birth) and vaccine-specific information that will allow plans to meet their health care operations needs associated with the vaccine (date the vaccine was administered, the identifier for the administering provider, the National Drug Code for the vaccine given). Other information, such as whether a first or second dose was administered, a code indicating where the patient resides (private home, long term care facility, or other location) and the site where the vaccine was administered, if that information appeared on the pharmacy claim, will also be included.

contractor, RelayHealth, which will send National Council for Prescription Drug Plans (NCPDP) B transactions for certain data concerning COVAX claims to all plans that are able to accept NCPDP claims.

COVAX Administration Data Sharing

Below, we provide more detail about the process by which plans can request certain data concerning COVAX claims. We note that plans will need to attest that they are requesting the minimum necessary data for their health care operations to receive the requested data. See 45 CFR §§ 164.502(b), 164.506(c)(4), and 164.514(d).

ABII-COVAX Web Portal

PDPs currently use the Additional Beneficiary Information Initiatives (ABII) portal to access certain Medicare Parts A and B claims data for their enrollees for purposes of ensuring appropriate payment for immunosuppressants and medications provided to patients who are receiving dialysis. The CMS contractor, Acumen, LLC (Acumen), will launch an ABII-COVAX Web Portal (ABII-COVAX) which will allow plans to request and receive certain COVAX data for their enrollees.

- For vaccines administered in a **non-pharmacy setting**, Acumen will use certain data from the Medicare Administrative Contractors (MACs) as soon as a MAC receives a COVAX claim. While CMS is encouraging providers and suppliers to submit claims as quickly as possible, this approach will help ensure timely access to certain vaccine data by not waiting until after the MAC pays the claim.
- For vaccines administered by **pharmacies**, which CMS expects to initially be the majority of claims, Acumen will receive certain data nightly from RelayHealth in a format consistent with the NCPDP B transaction standard (B transactions). Note: RelayHealth will not have access to claims from pharmacies that do not use a switch in their claims processing or that use roster billing. Acumen will receive these data through the MAC and report them through ABII-COVAX in a fashion similar to physician and supplier billing.

The ABII-COVAX report will include beneficiary-specific information with the National Drug Code (NDC) of the vaccine received and a submission clarification code identifying if the claim is for a first or second dose, when appropriate and available on the pharmacy claim, or the related Healthcare Common Procedure Coding System (HCPCS) codes reported for non-pharmacy claims. Once the MAC has adjudicated a pharmacy or provider or supplier claim, Acumen will update the claim status in its database so that a single record exists for each vaccination administered. Plans will be able to submit data-related questions to COVAX-Support@acumenllc.com.

NCPDP B Transactions

Part D sponsors currently receive NCPDP B transactions for drugs filled at a pharmacy. While the COVAX claims will be routed to a MAC for payment, RelayHealth will also begin to send NCPDP B transactions directly to Part D plans, once a plan has both requested that data be

provided and has the ability to process the transaction. The NCPDP B transactions are processed in real time, enabling the plan to be informed of their enrollees' vaccine status in near real-time. The NCPDP B transaction will include the NDC and a submission clarification code identifying if the claim is for a first or second dose, when appropriate and available on the pharmacy claim. Once a plan has informed RelayHealth that it has the capability to receive the COVAX NCPDP B transactions, those same encounters will no longer appear on the plan's ABII-COVAX reports, thus reducing the size of the ABII-COVAX reports and expediting the report download process.

Phased Approach for the COVAX Data Request and Sharing Processes

In order to make certain COVAX data available as soon as possible, we are implementing our COVAX data request and sharing strategy in phases.

- *Phase 1* – Effective immediately, plans can submit a request for certain data from CMS via the ABII-COVAX Web Portal. Upon approval, plans will then be able to download that information from ABII-COVAX on a weekly basis, based on the schedule outlined below. CMS will consider more frequent file production in the future. Instructions for requesting access to ABII-COVAX reports are included in the Attachments to this memorandum. **Plans should review their current ABII access and must submit an access request in order to receive the ABII-COVAX reports.**
 - By the week of January 11, 2021: Certain COVAX data, based on MAC claims, will be populated in the reports.
 - By the week of January 25, 2021: Certain NCPDP B transaction data will be available in ABII-COVAX for approximately 85 percent of pharmacies that process COVAX claims through a switch.
 - By the week of March 1, 2021: Certain NCPDP B transaction data available in ABII-COVAX for remaining pharmacies that process COVAX claims through a switch.
- *Phase 2* – By April 15, 2021, RelayHealth will send certain COVAX data directly to Part D plans as NCPDP B transactions. Plans that have opted to receive COVAX data may elect to receive the data via NCPDP B transactions rather than through the ABII-COVAX Web Portal. **Plans can indicate their readiness to receive these data via B transactions by sending an email to TBTSupport@relayhealth.com with the word “COVAX” in the subject line, and by including their plan’s contract ID and the date when they are able to accept the B transactions.**
- *Future Initiatives* – We recognize that some plans may prefer to access data through an application programming interface (API) rather than through ABII-COVAX downloads and/or the NCPDP B transactions. CMS may explore developing an API approach for requesting and sharing certain COVAX data at a future date.

We are also seeking suggestions about how MA plans that do not have a prescription drug benefit would be able to access NCPDP transactions, as these plans lack Bank Identification Number/Processor Number/Processor Control Number (BIN/PCN) values such that routing real time pharmacy claims information to these plans is currently not possible. Please share suggestions on how we might share certain real time pharmacy data with MA-only plans in a

similar fashion as for plans with a pharmacy benefit by emailing us at PartD_COB@cms.hhs.gov.

Important Claims Submission Notes for Pharmacies and Part D Plans

Consistent with the NCPDP billing instruction for vaccines, pharmacies will submit COVAX claims to the MACs under the newly developed NCPDP process for submitting vaccine claims, and all pharmacies, including those that use intermediaries for claims processing, should follow that instruction. Pharmacy claims submitted to a Medicare plan directly using a BIN/PCN will be rejected.

To prevent erroneous payments for claims that could be paid through the MAC, plans must ensure that they do not make payment for the costs of COVID vaccine or its administration. Pharmacy claims submitted to the plan for payment in the NCPDP format should be rejected with NCPDP Reject Code A5 “Not Covered Under Part D Law” in field 511-FB and include a free-form message instructing the submitter to bill the Medicare Vaccine MAC (FFS). Once Phase 2 begins, plans will need to process, but not pay, claims with Software Vendor/Certification ID field of 110-AK populated with value of PDTCOVAX to ensure appropriate capture of the information. These claims will have the following values in the pricing fields:

Field Label (Field)	Dollar Value
Ingredient Cost Submitted (409-D9)	\$ 0.01
Dispensing Fee Submitted (412-DC)	\$- 0.01
Incentive Amount Submitted (438-E3)	\$ 0.00
Gross Amount Due (430-DU)	\$ 0.00
U&C (426-DQ)	\$ 0.00

Questions about this memorandum may be sent to PartD_COB@cms.hhs.gov, about ABII to COVAX-Support@acumenllc.com, and about the Transaction Facilitator Process to TBTSupport@relayhealth.com.

Attachment I

The ABII-COVAX Web Portal

The ABII-COVAX Web Portal provides plans with a secure mechanism for retrieval of information about their enrollees to support plans' health care operations, such as case management, care coordination, or improving the health of their enrollees. The portal is accessible only to authorized users, and each contract has its own segmented space within the module. Plans will need to attest that they are requesting the minimum necessary data for their health care operations under each contract for which there is a request to receive the requested data.

Each plan's Medicare Compliance Officer (MCO) is responsible for obtaining and maintaining access to the ABII-COVAX Web Portal for their organization. Once a contract has been added to the ABII-COVAX Web Portal, the MCO is notified and is provided instructions on how to authorize users through the User Security Portal (Attachment II of this memorandum). In order to expedite the onboarding process, contracts with access to Acumen's Additional Beneficiary Information Initiatives (ABII) Web Portal will have their authorized user list from ABII duplicated for the ABII-COVAX Web Portal to serve as an initial list of authorized users for each contract. MCOs can make changes to the list of ABII-COVAX Web Portal authorized users for each of their contracts through Acumen's User Security Web Portal at any time. Once plans gain access to the ABII-COVAX Web Portal, they may request reports by submitting a data request form. Instructions for submitting data request forms are provided in Attachment II. Once registered to receive a report type, users will receive notifications from Acumen regarding updated report availability.

The following table summarizes the actions and timelines for requesting access to reports hosted on the ABII-COVAX Web Portal, including how plans can access certain data regarding their enrollees.

Action	Expected Turnaround
For Contracts without Current ABII Access. MCOs can complete the user authorization process for the ABII-COVAX Web Portal via Acumen's User Security Web Portal (instructions are provided in Attachment II below). To request ABII-COVAX reports, the plan's MCO will need to submit a data request and HIPAA attestation for the type of report required. Once approved, the MCO should refer to the User Authorization Instructions below to authorize individuals to access reports.	Requests will become active within one week after the request and attestation are submitted.
Contracts with Current ABII Access for CY 2021: If a contract wishes to access a certain report, such as that containing certain COVAX data, that contract's MCO needs to submit a data request and HIPAA attestation for the type of report required. The MCO should follow User Authorization Instructions below to authorize individuals to access ABII-COVAX reports. Contracts that already	

have access to ABII will have their initial set of ABII-COVAX users and access levels to match the ABII Web Portal. No action is necessary if your contract has no changes in reports required, or to authorized users or their levels of access. MCOs can modify existing user access through Acumen's User Security Web Portal.

Attachment II

User Authorization Instructions for Access to the ABII-COVAX Web Portal

This attachment provides instructions for adding users to the ABII-COVAX Web Portal. Requests for access will be approved within one week of submitting the request. To access the ABII-COVAX Web Portal, if your contract does not already have it, your contract's Medicare Compliance Officer (MCO) must complete the following steps:

1. Identify individuals who should have access to the ABII-COVAX Web Portal

You may choose to authorize representatives that are currently users on other Acumen Web Portals; however, each user authorization must be completed again, specifically for the ABII-COVAX Web Portal.

For security purposes, each contract is limited to fifteen authorized users on the ABII-COVAX Web Portal. All authorized users will have access to all relevant features of the ABII-COVAX Web Portal, including downloading reports, accessing discussion boards, and receiving e-mail notifications.

Prior to initiating any of the actions described below, please confirm and/or update your MCO's contact information in HPMS. This will ensure Acumen disseminates login credentials to the appropriate individual.

2. Log onto the User Security Web Portal

Access to the ABII-COVAX Web Portal is managed by each contract's MCO through Acumen's User Security Web Portal (https://PartD.ProgramInfo.us/User_Security). The latest MCO on record for each contract in HPMS has been granted access to the User Security Web Portal if the contract is active in at least one Acumen related web portal.

To access the User Security Web Portal:

- a. Navigate to the Web Portal at https://PartD.ProgramInfo.us/User_Security.
- b. Agree to the Warning Notice.
- c. Enter your username and login password.

Note that new users will receive a credential email to set up a password before they can log in using the steps above. If your MCO does not have access to the User Security Web Portal or requires assistance logging in, please contact Acumen at COVAX-Support@acumenllc.com.

3. Designate Users and Authorize Access Permissions

The MCO must log in to the User Security Web Portal to add new users and authorize access permissions or choose to authorize existing users to access your contract's information.

To designate users and authorize access permissions, MCOs must complete the following steps through the User Security Web Portal:

- a. Add an existing and/or new user.
- b. Select the Web Portal and contract(s) for each user.
- c. Authorize access permissions for each user.

MCOs must also designate themselves as one of the fifteen authorized users on the ABII-COVAX Web Portal in order to access the portal and submit data request forms. **It is recommended that all MCOs initially designate themselves as an authorized user for their contracts in order to complete the data request form upload process.**

Following the user authorization process, Acumen will send the following to each newly authorized ABII-COVAX Web Portal user:

- a. A welcome email with the ABII-COVAX Web Portal user guide and Web Portal URL.
- b. A credential email with a unique one-time password link and login username will be sent to users new to ABII.

For a contract's users to receive access to reports within ABII-COVAX, the MCO must fill out a form requesting the report be made available to users associated with the contract. The data request form is available on the web portal under the Help Documents section. Data request forms must be submitted by the MCO of the contract through the Upload Files page of the web portal. Only forms with a Form Status of "Complete" will be accepted, and forms must follow the naming convention below to be processed:

ContractID_ABII-COVAX_Data_Request_Form.xlsx

To ensure timely access to the ABII-COVAX Web Portal and the COVAX reports by the week of January 11th, 2021, requestors must complete all steps of the user authorization and data request form submission process by January 10, 2021. For requests made after January 10, 2021, access may be delayed, but is expected to be granted within one week of the request.

If you have any questions or require assistance with the user authorization process, please contact Acumen at to COVAX-Support@acumenllc.com.