



NATIONAL ASSOCIATION OF
Community Health Centers®

CHALLENGES AND EMERGING POLICY SOLUTIONS FOR ADULT IMMUNIZATIONS: A Post-Pandemic Updated White Paper

Presented by:

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NACHC



THE NACHC MISSION

America's Voice for Community Health Care

The National Association of Community Health Centers (NACHC) was founded in 1971 to promote efficient, high quality, comprehensive health care that is accessible, culturally and linguistically competent, community directed, and patient centered for all.



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Background:

Adult Immunization work 2019 - 2024

2019

Supported by the National Adult and Influenza Immunization Summit, *Strategies to Address Policy Barriers to Adult Immunizations in Federally Qualified Health Centers* published by NACHC Clinical Affairs and Policy teams

2019–2024

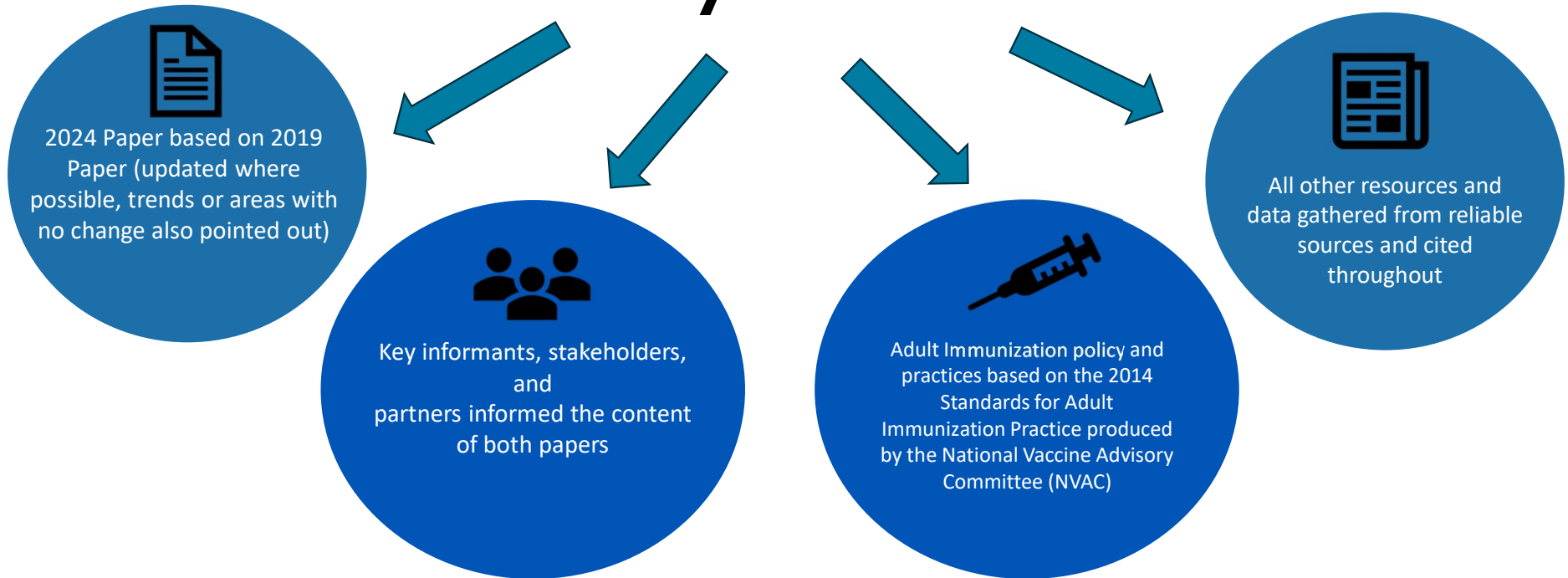
Funded by CDC and led by NACHC's Public Health Integration Team (Clinical Affairs), adult immunizations explored in these areas: *People, processes, technology and policy.*

2023

Second White Paper requested and published February 2024 to provide updates on adult immunization policy barriers.

2024 White Paper: Strategies to Address Policy Barriers to Adult Immunization in Federally Qualified Health Centers—an Update

Key Factors



2024 White Paper content

Each section begins with information/context and then provides strategies specific to that area

What makes FQHC's unique	Basic information including scope, mission and governance structure
Statutory and HRSA Requirements on FQHCs	Statutory and HRSA Requirements on FQHCs: Section 330, Uniform Data System, Clinical Quality Measures
Federal Torts Claims Act	How to harness coverage to increase vaccine access through workforce
Medicaid	Billing and Reimbursement
<i>Medicare</i>	Billing and reimbursement (especially medical vs pharmacy)
Pharmacy	Workforce and billing

What makes FQHC's unique

Target the neediest individuals

Offer a broad range of health care and enabling services

Turn no one away due to inability to pay

Community-based and governed

COMMUNITY HEALTH CENTERS IMPACT

Community Health Centers are nonprofit, **patient-governed** organizations that provide high-quality, **comprehensive primary health care** to America's **medically underserved communities**, serving **all patients** regardless of income or insurance status.

 **15K** Delivery Sites
 **1,400** Health Centers



31.5M people served (1 in 11)

400K Veterans

1.4M Homeless People

8.8M Children

3.5M Elderly Patients

 **1 in 7** rural residents

 **1 in 5** uninsured

 **1 in 3** people living in poverty

Statutory and HRSA Requirements on FQHCs

BARRIERS

FQHCs must adhere to the requirements laid out in Section 330 of the Public Health Service Act, and overseen by HRSA

Section 330 explicitly requires FQHCs to provide immunizations

HRSA incentivizes FQHCs' performance on the childhood immunization measure, but not the immunization measures that include adults

HRSA requires FQHCs to report annually on several vaccination measures

Individuals who receive immunization(s)—but no other services—from an FQHC are not considered FQHC "patients" by HRSA

FQHCs likely under-report their actual immunization activity

SOLUTIONS

HRSA could add a composite adult immunization measure(s) to the data that FQHCs must report annually to HRSA, exploring the 2019 HEDIS Prenatal composite measure, or MIPS or MSSP recommendations.

HRSA could consider performance on the adult immunization measure when determining which FQHCs receive supplemental grant funding and/or public recognition.

Outside groups could incentivize FQHCs to focus on adult immunization by offering funding and/or public recognition linked to adult immunization rates.

Outreach and support could be targeted to FQHCs that focus on specific at-risk populations.

Federal Torts Claims Act

BARRIERS

***Lack of information
around FTCA coverage***

SOLUTIONS

Section 330 grantees
receive free medical
malpractice insurance
through the Federal
Torts Claims

FTCA malpractice
coverage applies to
community-focused
immunization
campaigns

FTCA malpractice
coverage is available for
clinicians who volunteer
at FQHCs

Updated policy since
COVID-19 that positively
impacts workforce



Medicaid

BARRIERS

***Medicaid does pay FQHCs for adult immunization—
but indirectly in most states.***

To make immunization-only visits with nurses and pharmacists (“nurse/pharmacist immunization-only visits”) separately billable for FQHCs, states must (re) calculate each FQHC’s PPS rate.

The administrative effort and financial impact involved in recalculating FQHCs’ PPS rates varies by state.

SOLUTIONS

Make nurse/pharmacist immunization only visits “billable visits” under the FQHC Medicaid PPS.

Permit FQHCs to bill for immunization only visits outside of the FQHC PPS, using an APM.

Medicare

BARRIERS

The costs of most — but not all — immunizations are included in FQHCs' PPS rates (exceptions are flu and pneumococcal)

Medicare reimburses FQHCs for influenza and pneumococcal vaccination through their annual Cost Reporting Process which can be a process of 12-18 months

SOLUTIONS

Inflation Reduction Act ends cost sharing for ACIP-recommended vaccines (new, as of 2023)

FQHCs could maximize nurse/pharmacist visits for influenza and pneumococcal and COVID-19 vaccines for Medicare patients

To reduce delays in reimbursement for influenza and pneumococcal vaccines, CMS could permit FQHCs to bill for these vaccines under the Part B fee schedule at time of service, as long as these interim payments are later reconciled with their Cost Reports

Pharmacy

BARRIERS

***Lack of information around
pharmacy role in
immunization***

SOLUTIONS

***FQHCs could explore the role of
in-house and clinical
pharmacists in recommending
and administering
adult vaccines with
considerations:***

***Medicaid and Medicare
billing***

***Variations in state law and
scope of practice***

***Cost-benefit analysis of
pharmacist immunizing***

Practical Application of Policy Strategies in the Field

1

Scope of practice
of pharmacy techs



2

COVID 19
Commercialization



3

Inflation Reduction Act →
coverage of Shingles
vaccine and other offerings



Suggested Applications of White Paper to the field

Grounding
& Education

Partnerships

Advocacy

To Access the White Paper:

<https://www.nachc.org/topic/adult-immunizations/>

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