



TO: TennCare Managed Care Organizations
FROM: Keith Gaither, Director of Managed Care Operations
DATE: February 25, 2022
SUBJECT: Reimbursement of COVID-19 Vaccine Counseling for All Ages

TennCare recognizes the additional administrative responsibilities placed on Tennessee’s providers when providing COVID-19 vaccine counseling. It is important that Tennessee’s providers take time to answer any questions that Tennesseans may have concerning COVID-19 vaccines so that Tennesseans may receive this professional consultation and make a personal decision regarding the vaccine. In addition, it is important that Tennessee providers receive payment for COVID-19 vaccine counseling regardless of whether or not the patient receives the vaccine. This is consistent with federal guidance from the Centers for Medicare and Medicaid Services (CMS) on the importance of vaccine counseling and CMS directive that vaccine counseling falls within the scope of the mandatory EPSDT benefit for children enrolled in Medicaid.

Effective March 15, 2022, for both Medicaid and CoverKids members of all ages, TennCare’s MCOs will reimburse providers for COVID-19 vaccine counseling whether the vaccine counseling occurs in conjunction with a preventive health visit (e.g. Early and Periodic Screening, Diagnostic, and Treatment (EPSDT) or annual adult physical examination), in conjunction with an office visit when another service was provided (e.g. office visit to address diagnosed illness(es), new issues, and/or refills), or when COVID-19 vaccine counseling is the sole reason for the office visit. Providers must bill CPT 99401 with a CR modifier to indicate a PHE code. There is no requirement for a specific diagnosis code. This vaccine counseling code (CPT 99401) can only be billed once per day. This service can only be provided by MD/DO, NP, PA, CNM and, if provided at LHD, FQHC or RHC by one of these professionals, will be reimbursed outside of the PPS rate. The following coding criteria will apply:

- Requires 25 modifier if in addition to OV E&M, when the vaccine counseling was provided during an office visit when another service was provided to the patient to address diagnosed illness(es), new issues, and/or refills
- Requires CR and GT modifiers if provided via telehealth
- Requires CR and KX modifiers if provided telephonically

Providers are allowed to bill for vaccine counseling using CPT 99401 in conjunction with a preventive office visit, such as an adult’s annual physical examination or a child’s well child exam/EPSDT visit. Providers can be reimbursed for providing vaccine counseling to parents or guardians of Medicaid and CoverKids children, in which the parents or guardians are not TennCare members. The counseling session for the parent or guardian can be billed to the child’s Medicaid ID, but only one code can be billed per day. Billing for pediatric counseling is allowed for eligible child members as authorized by the Food and Drug Administration (FDA), which is currently authorized for children ages 5 years and older. **Reimbursement of COVID-19 vaccine counseling for all ages will remain in effect until the end of the federal public health emergency (PHE). MCOs should notify providers as appropriate of this change by posting this update to your MCO’s provider website and emailing a provider alert/bulletin/e-blast.**