



NEW YORK CITY DEPARTMENT OF
HEALTH AND MENTAL HYGIENE

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Dear Providers,

The New York City Department of Health and Mental Hygiene Vaccine Outreach and Counseling Program (VOCP) was launched in the fall of 2021 and pays managed care assigned primary care providers for proactive calls to counsel unvaccinated patients from a list supplied by the health plan. This program was started in partnership with seven health insurance companies at a time when COVID-19 vaccine counseling was not reimbursable for providers. The program recognized that a health care provider's strong recommendation for vaccination is one of the most promising ways to get every eligible person vaccinated.

We are pleased to report that COVID-19 vaccine counseling is now covered by New York State (NYS) Medicaid for people ages 5 years and older who have not received any dose of a COVID-19 vaccine (i.e., not applicable to additional dose or booster counseling). We are pleased to see that the Medicaid coverage is more expansive than the VOCP program, so the VOCP program, in its current form, will not continue past December 31, 2021.

There are five key differences between NYS Medicaid reimbursement of vaccine counseling services and that provided by the City's VOCP program:

- Under NYS Medicaid, vaccine counseling must last at least 8 minutes. (In VOCP, the provider can bill for counseling that lasts at least 3 minutes)
- Under NYS Medicaid, providers can bill for counseling provided to any member who has not received any COVID-19 vaccine dose. (In VOCP, providers can bill only for counseling provided to members of participating health plan and only if those members appear on the health plan's unvaccinated patient list)
- Under NYS Medicaid program, providers can bill for counseling as a stand-alone service or in addition to an Evaluation and Management (E&M) code for a visit when all the components of both the E&M and COVID-19 counseling requirements are met and documented. (In VOCP, counseling can be billed only when provided as a stand-alone service)
- Under NYS Medicaid, reimbursement is \$25 per counseling session performed by eligible providers. (In VOCP, counseling is reimbursable at \$25 or \$50 depending on the qualifications of the team member who provided the counseling.)
- Under NYS Medicaid, billing guidance varies based on provider type and setting, which applies to all Medicaid fee-for-service and managed care plans; separate guidance is provided for physicians, nurse practitioners, licensed midwives, pharmacists, Article 28 clinics billing ordered ambulatory, Federally Qualified Health Centers, and other qualified rate-based providers. (In VOCP, billing guidance varies by health plan and whether the counselor is a clinician or non-clinician, not by type of billing entity.)

The Medicaid benefit (Medicaid-funded) and the VOCP Program (city-funded) will co-exist until December 31, 2021. Therefore, for providers currently conducting vaccine counseling:

1. If you are counseling a patient as part of the VOCP program, you must bill using the billing codes provided by your health plan for the NYC VOCP program, **not** the Medicaid guidance for the new benefit. This is important because Medicaid is always the payer of last resort.
 - **Example:** A patient is on a VOCP list provided to you by the health plan. You do proactive outreach to the patient exclusively for the purpose of counseling for vaccination, and you counsel the unvaccinated patient according to VOCP program guidelines by December 31, 2021. You should bill the health plan according to the guidance they provided to you when they supplied the list. Do not bill using the Medicaid guidance.
2. If you are counseling a patient not as part of the VOCP program, bill using

Medicaid guidance.

3. If you have billed for counseling to a patient as part of the VOCP program, but the patient remains unvaccinated, you can provide COVID-19 vaccine counseling during a subsequent encounter on a different date of service and bill for that new counseling visit using Medicaid guidance.

Please refer to VOCP program guidance [here](#), and billing guidance supplied by each participating health plan. Please refer to NYS Medicaid guidance for COVID-19 Vaccine Counseling [here](#).

Thank you for your continued commitment to protecting the health of New Yorkers.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michelle Morse', with a stylized flourish at the end.

Michelle Morse, MD, MPH
Chief Medical Officer
Deputy Commissioner, Center for Health Equity and Community Wellness
New York City Department of Health and Mental Hygiene