

January 2, 2025

URGENT CHANGES TO COVID FOR THE PHARMACY BENEFIT

BACKGROUND

VDP published notices on Aug. 19 and Dec. 5, 2024, regarding COVID-19 changes. These changes were due to the expiration of the federal “Public Readiness and Emergency Preparedness Act for Medical Countermeasures Against COVID-19” (PREP Act). VDP received notification on Dec. 13, 2024, that the U.S. Department of Health and Human Services issued a new amendment under the current declaration of the PREP Act that will extend through Dec. 2029 selected current amendments facilitating pharmacy access. This means that the expiration of several flexibilities VDP previously communicated will no longer occur. Therefore, MCOs must discontinue any changes that would have ended these flexibilities and continue these past Jan. 1, 2025, through Dec. 31, 2029. These include the following:

- Active pharmacists, active supervised pharmacist interns, and active pharmacy technicians are authorized by the PREP Act to administer COVID-19 and influenza vaccines for three years and older.
- Active pharmacists are authorized by the PREP Act to order/prescribe COVID-19 at home tests and COVID-19 therapeutics.

Only the products on the VDP formulary are available for reimbursement to pharmacies through the pharmacy benefit.

KEY DETAILS

Topic #1: Change to Patient Vaccination Age at Pharmacy

- New Requirements as of Dec. 13, 2024:
 - MCOs must continue to cover and reimburse through the pharmacy benefit COVID-19 and influenza vaccines on the VDP formulary that are administered by active pharmacists, active supervised pharmacist interns, and active pharmacy technicians to Medicaid members ages three and up through Dec. 31, 2029.
- Old Requirements from previous notice (Aug. 19, 2024):
 - VDP notified MCOs on Aug. 19, 2024, that the age for pharmacist-administered vaccines is reverting to current state law due to the ending of the federal law. VDP directed MCOs to ensure the age edits for these vaccines comply with state law. VDP clarifies that COVID-19 vaccines will not be available in Medicaid for children aged 18 and younger, as the Vaccines for Children (VFC) program covers these. MCOs must deny pharmacy claims for COVID-19 vaccines for this age group as MCOs already do for other vaccines for children. VDP covers fully FDA-approved COVID-19 vaccines for adults 19 years and older enrolled in Medicaid. MCOs must also cover these, adhering to the VDP formulary, through the pharmacy benefit for adults ages 19 and older and reimburse the pharmacy for the administration and product. This notice does not speak to COVID-19 vaccine coverage through the medical benefit.

Topic #2: Pharmacist Prescribing At-Home COVID-19 Tests and Therapeutics

- New Requirements as of Dec. 13, 2024:
 - MCOs and PBMs must continue coverage of COVID-19 at-home tests and COVID-19 therapeutics that are included on the VDP formulary when prescribed by a pharmacist through Dec. 31, 2029. This means that MCOs and PBMs can continue with the “dummy code” programming for COVID-19 at-home tests. See the information below in “Old Requirements”.
- Old Requirements from previous notices (Aug 19. and Dec. 5, 2024):
 - On Aug. 19, 2024, VDP directed MCOs to end coverage of at-home COVID-19 tests without a prescription starting Jan. 1, 2025. VDP clarifies that we will end the "dummy NPI" availability when a member does not have a prescription for an at-home COVID-19 test on Jan. 1, 2025.
 - MCOs must also end the availability and usage of the "dummy NPI" and only allow payment of at-home COVID-19 tests on the VDP formulary prescribed by a licensed prescriber, effective Jan. 1, 2025. See MCO notices from Dec. 23, 2021, and Feb. 3, 2022, describing the "dummy code" requirement for at-home COVID-19 tests.

ACTION

MCOs must ensure they and their PBMs comply with this policy by Jan. 1, 2025. MCOs must implement system changes and policies to prevent claims for COVID tests or COVID therapeutics prescribed by a pharmacist.

RESOURCES

Previous notices attached:

- [2024 0819 - VDP Changes For COVID-19 Post-Public Health Emergency.pdf](#)
- [2024 1205 - Update to VDP Changes For COVID-19 Post-Public Health](#)