



**Date:** October 3, 2023

**To:** Coordinated care organizations (CCOs)

**From:** Dave Inbody, CCO Operations director, Health Systems Division  
Mimi Luther, Immunization Program interim section manager, Public Health Division

**Subject:** COVID-19 commercialization effective date; impact on CCO members under age 19

The communication is to provide CCOs with notice of the effective date for [COVID-19 commercialization](#) and to remind CCOs how this date affects Oregon Health Plan (OHP) coverage for COVID vaccines for children under age 19.

As explained in the Oregon Health Authority's (OHA) [communication](#) to CCOs on August 21, 2023, COVID-19 commercialization means the transition of COVID vaccines to the established pathways of procurement, distribution, and payment for vaccines. For OHP children under age 19, the established pathway is through the [Vaccines for Children](#) (VFC) program by VFC-enrolled providers.

On September 11, 2023, the federal government [announced](#) approval and authorization for emergency use of the updated COVID-19 vaccines for 2023-2024 and termination of the emergency use authorization for the previous vaccines. These decisions are effective on the date of the announcement. OHA reviewed this and other federal announcements and also consulted with internal subject matter experts. The outcome of this review is that **OHA considers September 11, 2023, to be the effective date for COVID commercialization.**

As of September 11, OHP only covers COVID-19 vaccines for children under age 19 from VFC providers. Under the "No Wrong Door" policy in the recent CCO contract [amendment](#), children who are CCO members can receive COVID vaccines from *any* Oregon VFC provider, regardless of whether the provider has a contract with the CCO. If the provider is not contracted by the CCO, then they can bill OHA for the vaccine administration. (VFC providers do not bill for the vaccine because it is provided to them at no cost.)

OHA recognizes that the lack of advance notice by the federal government about the COVID-19 commercialization effective date and the uneven availability of COVID vaccines make it challenging for CCOs to comply with the requirement for children under age 19 to receive COVID vaccines only from VFC providers. OHA expects CCOs to make all reasonable efforts to encourage the use of VFC providers for COVID vaccines. OHA acknowledges that, due to lack of availability, it may be necessary for some children to receive COVID vaccines from non-VFC providers during the commercialization transition period. As a result, **OHA will not enforce the requirement that children receive COVID vaccines only from VFC providers until November 1, 2023.**

To verify Oregon VFC providers, use the Public Health Division's [map](#). If you cannot find a provider using this map, contact the VFC help desk at 800-980-9431 or [VFC.Help@oha.oregon.gov](mailto:VFC.Help@oha.oregon.gov).

**Correction:** In the August 21 CCO communication, OHA stated that upon COVID-19 commercialization, OHP would only cover flu vaccines for children under age 19, including CCO members, from VFC providers. OHA recently changed the effective date for this requirement. In the “Provider Matters” e-newsletter dated September 22, 2023, OHA [announced](#) that the new effective date for this requirement is November 1, 2023.

### Questions?

- About this communication: Please email [Cheryl.L.Henning@oha.oregon.gov](mailto:Cheryl.L.Henning@oha.oregon.gov).
- About COVID-19 commercialization: Please email [David.Krueger@oha.oregon.gov](mailto:David.Krueger@oha.oregon.gov).

Thank you for your continued support of the Oregon Health Plan and the services you provide our members.