



Date: September 13, 2024
To: Coordinated care organizations (CCOs)
From: David Inbody, CCO Operations director
Subject: End dates for COVID flexibilities (updated September 24, 2024)¹

The purpose of this communication is to remind CCOs about upcoming end dates for flexibilities in effect due to the COVID-19 public health emergency.

The following flexibilities will **end September 30, 2024**:

- “No wrong door” for COVID vaccine and vaccine administration expenses
 - This flexibility is described in the COVID non-risk payment [contract amendment](#) signed by the Oregon Health Authority (OHA) and CCOs in fall 2023.
 - Beginning October 1, each CCO:
 - Is responsible for paying non-contracted providers for COVID vaccine and vaccine administration expenses.
 - Can decide whether to require prior authorization for COVID vaccines from non-contracted providers.
- “No wrong door” for COVID therapeutics
 - This flexibility is described in OHA’s [memo](#) to CCOs dated March 14, 2024.
 - Beginning October 1, each CCO is responsible for paying non-contracted providers for COVID therapeutics.
- Enhanced fee-for-service (FFS) reimbursement rate for COVID vaccine administration
 - This flexibility is described in the COVID non-risk payment contract amendment and in the [memo](#) dated January 11, 2024.
 - Effective October 1, OHA’s FFS reimbursement rate for Oregon Health Plan (OHP) members **under age 19** will revert to the regular Vaccines for Children

¹ Updates to the original communication are highlighted in **yellow**.

(VFC) rate of \$21.96 for vaccines from VFC providers. The rate for members under age 19 from non-VFC providers and for members age 19 and over will remain \$43.43.

The COVID flexibilities listed below are also scheduled to end September 30, 2024. OHA intends to continue coverage pending approval by the Centers for Medicare and Medicaid Services (CMS), which has been requested. OHA will provide CCOs with notice about this decision as soon as possible.

- COVID therapeutics approved under Emergency Use Authorization
- COVID home test kits

The end date for the following flexibility is **corrected** from September 30, 2024, to **December 31, 2024**:

- CCO members under age 19 may receive COVID vaccines from any Oregon Medicaid provider, regardless of the provider's enrollment in the VFC program.
 - The end date for this flexibility is incorrect in the memo dated January 11, 2024.
- Effective January 1, 2025, all children's vaccines must be from VFC-enrolled providers, including COVID vaccine.

What should you do?

Each CCO should:

- Widely distribute the information provided in this communication. This includes notifying CCO members, staff, subcontractors, and providers, as appropriate.
- Ensure encounter data for COVID vaccine and administration expenses for dates of service through September 30, 2024, is successfully submitted to OHA by January 31, 2025. This requirement is described in the COVID non-risk payment contract amendment.

Questions?

- **About this communication:** Please email Cheryl.L.Henning@oha.oregon.gov.
- **About FFS payment rates:** Please email Medicaid.Programs@odhsaha.oregon.gov.

Thank you for your continued support of OHP and the services you provide to our members.