Date: March 12, 2021

To: Coordinated Care Organizations

From: Dave Inbody, CCO Operations Manager

Subject: Suspension of credentialing requirements for COVID-19 vaccination administration providers & requirements for encounter submissions for COVID-19 vaccinations

Credentialing Exemption for COVID-19 Vaccine Providers

OHA received approval from CMS to rely on enrollment and application materials of Medicare and other states’ Medicaid programs to enroll COVID-19 vaccination administration providers as OHP providers. CMS advised that OHA also has the authority to waive credentialing requirements for CCOs to enroll these providers for the purpose of COVID-19 vaccine administration. OHA Fee-For-Service (FFS) and CCOs have been given the allowance to bypass full credentialing for providers who are enrolled with any other state’s Medicaid program or with Medicare.

A minimal amount of data regarding these providers is required to register them in the State of Oregon claims processing system to allow the payment of vaccination administration claims or reporting of encounter claims; however, CCOs will not be required to complete and document the full credentialing process in those cases.

To ease burden on both prospective vaccine administration providers and CCOs, OHA is filing a temporary rule change to OAR 410-141-3510 Provider Contracting and Credentialing. This rule change will allow CCOs to rely on the most recent weekly updates of OHA’s active file of COVID-19 vaccine administration providers in lieu of credentialing these providers.

CCOs will identify these providers in the weekly provider enrollment file by the word “COVID” in the license number field.

Non-OHP Enrolled COVID-19 Vaccine Administration Rendering Providers

Given the wide array of staffing models for vaccination sites, OHA recognizes the need for flexibility and relaxing administrative burdens. Therefore, OHA will allow the administration fee
to be submitted for billing utilizing the supervising and enrolled pharmacist or medical provider as the rendering or administering provider.

This flexibility is applicable to pharmacist and other licensed professionals who are authorized to administer the COVID-19 vaccine and enrolled with OHP.

**Examples**

- For traveling pharmacists who are not enrolled with OHP, the rendering provider should be the supervising pharmacist who is actively enrolled with OHP.
- For individuals administering the vaccination who are not independently enrollable (i.e. EMTs, RNs, National Guard members, etc.), the rendering provider on those claims should be the OHP-actively enrolled supervising medical practitioner.

Additionally, any enrolled Licensed Health Care Professional (LHCP) can provide vaccinations when it is within their scope of practice. These include physicians, osteopaths, podiatrists, chiropractors, certified nurse practitioners, physician assistants, naturopathic physicians, dentists, nurses under the supervision of a LHCP, and pharmacists. Other types not listed may be able to vaccinate if they are supervised by existing licensed practitioners and perform services within the licensed practitioner’s scope of practice.

**Questions?**

If you have questions about this communication, please contact Mary Durrant at [Mary.Durrant@dhsoha.state.or.us](mailto:Mary.Durrant@dhsoha.state.or.us)

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