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**Date:** August 21, 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:** Oregon Health Plan coverage of children's COVID-19 and flu vaccines and their administration

This purpose of this communication is to update CCOs on current and planned COVID-19 and flu vaccine operations and payment for children under age 19. Later this year, Oregon Health Plan (OHP) will cover children's COVID and flu vaccines and associated administration fees only when provided through the [Vaccines for Children](#) (VFC) program by VFC-enrolled providers.

Currently, adults and children enrolled in CCOs can receive COVID-19 vaccines from any Oregon Medicaid provider. This is referred to as the "No Wrong Door" policy. This policy is based on the Oregon Health Authority's (OHA) COVID contract amendments with CCOs in effect since December 15, 2020. That is when the federal government began to supply COVID vaccines at no cost to states.

For the 2022-23 flu season, all children on OHP could receive flu vaccines from any Oregon Medicaid provider. This was because OHA temporarily suspended the requirement for them to only receive flu vaccines from VFC providers. OHA had special approval to use state funds to pay for vaccines administered outside the VFC program. This was to ensure that eligible children could receive COVID-19 and flu vaccines at the same time, regardless of VFC participation.

The federal government's plan for [COVID-19 commercialization](#) will go into effect later this year. OHA expects this to happen early in the fourth quarter of 2023 or possibly late in the third quarter. This change means COVID vaccines will transition to established pathways of procurement, distribution, and payment, such as the VFC program for children's vaccines.

When commercialization happens, the latest CCO COVID-19 contract [amendment](#) will go into effect. Under this amendment, the "No Wrong Door" policy will continue to apply as-is to adults enrolled in CCOs. However, due to federal requirements, children enrolled in CCOs must only receive COVID vaccines from VFC providers. For them, the "No Wrong Door" policy means they 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 will eventually end the "No Wrong Door" policy for COVID-19 vaccines for CCOs. When this happens, OHA will notify CCOs in writing at least 30 business days in advance. When the policy ends, each CCO will be able to decide whether to require non-contracted providers to obtain Prior Authorization to provide COVID vaccines to CCO members. There is no change to the requirement that children enrolled in CCOs must only receive COVID vaccines from VFC providers.

OHA expects flu vaccines for the 2023-24 season to be available beginning in September. For the first part of the season, OHA will be able to continue using state funds to allow children on OHP to receive flu vaccines from any Oregon Medicaid provider. However, this will end when COVID-19 commercialization happens. At that time, all children on OHP must only receive flu vaccines from VFC providers. OHA will send a separate communication to providers about this.

Please ensure that, upon commercialization, only VFC providers administer COVID-19 and flu vaccines to children enrolled in CCOs. 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).

### **Questions?**

- About this communication: Please email [Chery.L.Henning@oha.oregon.gov](mailto:Chery.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.