

Pennsylvania Division of Immunizations COVID-19 Vaccination Bridge Access Program Fraud and Abuse

All providers agree to comply with the Pennsylvania Immunization Program requirements outlined in the Provider Application and discussed during site visits. Lack of adherence could lead to fraud and abuse charges filed against the provider. Noncompliance may be due to an unintentional lack of understanding of program requirements, or the behavior may be intentional.

Instances of suspected noncompliance or fraud and abuse may be identified by any of the following:

- Division of Immunizations staff
- Provider staff
- A third party

The terms “fraud” and “abuse” related to the PA Immunization Program are consistent with the definitions in Medicaid regulations (42 CFR § 445.2).

Fraud: an intentional deception or misrepresentation made by a person with knowledge that the deception could result in some unauthorized benefit to himself or some other person. It includes any act that constitutes fraud under applicable federal or state laws.

Abuse: provider practices that are inconsistent with sound fiscal, business, or medical practices and result in an unnecessary cost to Division of Immunizations (and/or including actions that result in an unnecessary cost to Medicaid, a health insurance company, or a patient) or in reimbursement for services that are not medically necessary or that fail to meet professionally recognized standards for health care.

Examples of Fraud and Abuse:

- Failing to comply with any part of the Provider Application
- Providing PA Immunization Program vaccines to non-eligible patients
- Selling or otherwise misdirecting PA Immunization Program vaccine
- Billing a patient or third party for PA Immunization Program supplied vaccine
- Charging more than the established maximum regional fee for administration of PA Immunization Program vaccine
- Over-ordering PA Immunization Program vaccine (e.g., quantities or patterns do not match the provider’s profile)
- Denying eligible adults access to PA Immunization Program funded vaccine because of the patient’s inability to pay the administration fee
- Failing to screen for and document eligibility status at each visit
- Failing to maintain PA Immunization Program records for a minimum of three years
- Failing to fully account for PA Immunization Program-funded vaccine
- Failing to properly store and handle PA Immunization Program vaccine

Division of Immunizations is required to report any suspected fraud and abuse to state and federal authorities for further investigation.