Use of Vaccine Purchased with 317 Funds

The following clarifications only apply to Section 317 vaccine funding. Vaccines for Children (VFC) will continue to provide vaccines for uninsured children, Medicaid eligible children, and American Indian/Alaska Native children.

1. CDC definition of under- and fully-insured: The terms “underinsured” and “fully insured” are defined as follows:

   • **Underinsured**: Underinsured means the child has health insurance, but it doesn’t cover vaccines, or doesn’t cover certain vaccines. Underinsured children are eligible to receive vaccines only at Federally Qualified Health Centers (FQHC), Rural Health Clinics (RHC), or under an approved deputation agreement such as a Deputized State Health Center (SHC). An FQHC is a type of provider that meets certain criteria under Medicare and Medicaid programs.

   • **Fully Insured**: Anyone with insurance that covers the cost of vaccine, even if the insurance includes a high deductible or co-pay, or if a claim for the cost of the vaccine and its administration would be denied for payment by the insurance carrier because the plan’s deductible had not been met.

PA Department of Health may not administer Section 317 vaccines to fully insured children or adults, except in limited circumstances.

An underinsured child may receive Vaccines for Children (VFC) funded vaccine if the child is seeking vaccinations in a Federally Qualified Health Center (FQHC) or Rural Health Clinic (RHC) or under approved deputation agreements (Deputized SHCs).

The clarification of the 317 vaccine policy, generally, focuses on ensuring that insured individuals receive their vaccinations through their insurance provider network, and are not subsidized through federal funding.

2. Do not use 317 vaccines for:

317 vaccines may not be used to vaccinate:

   • Fully insured children and adults seen in public clinics
   • Fully insured children and adults seen in private provider offices
   • Adults with Medicare coverage for vaccines (Part B)
   • Adults with Medicaid coverage for vaccines
   • Fully insured adults seen in STD/HIV clinics or drug treatment centers
   • Fully insured parents of newborn infants participating in Tdap cocooning projects
   • Fully insured adults at high risk for acquiring Hepatitis A
   • Fully insured children and adults with a high co-pay or deductible
• Fully insured students receiving vaccines for college entry at Public Health Clinics or College health facilities
• Fully insured children and/ adults in low medical access areas
• Fully insured adults in LTCs/eldercare
• Fully insured children in school-based health centers or clinics
• Fully insured “high risk” occupational groups (e.g. EMS, first responders, health care workers) for hepatitis A or B or other diseases
• Fully insured adults and children receiving vaccines as part of a community wide outreach event (including mobile vans and health fairs)
• Children who are insured by SCHIP standalone programs

3. 317 vaccines may be used for:
Exceptions- 317 vaccine funds may be used to vaccinate the following:
• Uninsured or underinsured adults
• Fully insured individuals seeking vaccines during public health response activities including:
  o Outbreak response (regardless of insurance status)
  o Post-exposure prophylaxis
  o Disaster relief efforts
  o Mass vaccination campaigns or exercises for public health preparedness
• Individuals in correctional facilities and jails

4. 317 vaccine for underinsured children: Underinsured children who are seeking services in an FQHC or under a deputization arrangement (Deputized SHCs and County Municipal Health Departments (CMHDs) are considered VFC eligible and therefore VFC vaccines must be used and 317 vaccines must not be used.

Unless, the vaccines are being given at a health care facility that is neither an FQHC nor has it been deputized, then 317 funded vaccines can be used.

• Definition: FQHCs and RHCs are permitted to delegate authority to public health department clinics or other providers to address situations in which the FQHC or RHC capacity to vaccinate underinsured children is exceeded by the number of underinsured children.
Frequently Asked Questions

Some of our fully insured clients have very high deductibles; can we use 317 vaccine funds to immunize them if they have not met their deductible?
No. Section 317 vaccine may not be used to routinely vaccinate any fully-insured individual. 317 vaccine may be used to vaccinate under-insured individuals whose insurance does not cover vaccination.

Can 317 vaccine funds be used for birth doses of Hepatitis B?
No, VFC may only be used for the birth dose of hepatitis B. The CDC wants to ensure that important strides made in vaccination coverage are not compromised.

Can we use 317 vaccine for non-Medicaid covered vaccines?
Yes, if Medicaid does not cover a vaccine for adults, the adult is considered underinsured for that vaccine and may receive 317 funded vaccines.

Can we use 317 vaccine for immigrants and refugees?
Yes, since PA does not provide immigrants and refugees with medical benefits and the individuals do not have employer-sponsored health insurance, then they are considered uninsured and may be vaccinated with VFC vaccine for (0-18yrs) and 317 funded vaccines for adults. (Note: We are not authorized to verify citizenship).

What is the role of the Section 317 Immunization Program?
The Section 317 Immunization Program plays a critical role in achieving national immunization coverage targets and reductions in disease. Behind every vaccine given to a child, adolescent, or adult in the United States are public health systems and experts that are essential to a successful immunization program.

If a vaccine is not covered by Medicare Part B, may I vaccinate adults on Medicare Part B with 317 funded vaccine?
Medicare Part B does not cover certain vaccines, including Zoster, Tdap or Td. However, all Medicare Part D plans are required to cover ACIP-recommended vaccines not covered under Medicare Part B. Thus, if the individual has both Medicare Part B and Part D, he/she is considered fully insured for vaccines and may not receive 317 funded vaccines. If the individual does not have Medicare Part D coverage, then he/she is considered underinsured for those vaccines and may receive 317 funded vaccines.

Can I still vaccinate, even if the individual already has a medical provider?
Yes, as long as the individual is screened and documented for eligibility and meets the criteria.

What are the VFC guidelines for administering HPV vaccine to adults?
The Division of Immunizations has updated guidance on use of Section 317 funding for HPV vaccine. Previously, DOI policy has been to allow HPV vaccine purchased with Section 317 funds to be used only for ‘catch-up’ to age 26. Now, Section 317 funding
may be used, based on shared clinical decision-making recommendations, to vaccinate adults ages 27 through 45 years.

Please review the following CDC guidance when ordering this vaccine for ages 27 through 45 years.
The Centers for Disease Control and Prevention (CDC) recommends 11- to 12-year-olds get two doses of HPV vaccine to protect against cancers caused by HPV. The Advisory Committee on Immunization Practices (ACIP) also recommends vaccination for everyone through age 26 years if not adequately vaccinated when younger. HPV vaccination is given as a series of either two or three doses, depending on age at initial vaccination.

Vaccination is not recommended for everyone older than age 26 years. Some adults ages 27 through 45 years might decide to get the HPV vaccine based on discussion with their clinician, if they did not get adequately vaccinated when they were younger. HPV vaccination of people in this age range provides less benefit, for several reasons, including that more people in this age range have already been exposed to HPV. **For adults ages 27 through 45 years, clinicians can consider discussing HPV vaccination with people who are most likely to benefit.** HPV vaccination does not need to be discussed with most adults over age 26 years. See ACIP’s [shared clinical decision-making FAQs](#).

What vaccines are available for VFC providers to purchase with 317 funds?
The following vaccines are available for Pennsylvania VFC providers to order with 317 funds:

- Hep A
- Hep B
- Hep A&B
- HPV9
- Influenza
- MCV4
- MenB
- PNU-13
- PNU-23
- Shingrix
- Td
- Tdap
- Varicella