

SECTION 2 – PROVIDER ENROLLMENT/ REQUIREMENTS/RESPONSIBILITIES

New Provider Enrollment

Providers interested in enrolling in the Pennsylvania Vaccines for Children Program (Pa. VFC Program) should call 1-888-646-6864 to request a VFC enrollment packet. The steps to enroll are:

- Complete and submit the Pa. Vaccines for Children Program provider agreement form (Pa. VFC PPA) by fax to 717-214-7223.
- Upon receipt of the completed Pa. VFC PPA, a provider identification number (PIN) will be assigned to your facility.
- A copy of the VFC provider handbook will be mailed to your facility; this should be reviewed by the physician(s), office manager, primary and backup VFC contacts prior to the enrollment/training site visit.
- Prepare your office and staff for a site visit to go over the administrative requirements of the program and to ensure proper storage and handling of vaccines when received.
- View the video, “Keys to Storing and Handling Your Vaccine Supply” and print credentials from the CDC website. This is required for all new enrollments and re-activations. The video is found at the following site:

<http://www2a.cdc.gov/vaccines/ed/shvideo/>
<http://www.youtube.com/watch?v=0atwOngjVQY>

- An immunization nurse from your district will contact you to schedule an enrollment/training site visit to review all aspects of the VFC program, to ensure that the vaccine storage units and dataloggers meet the requirements of the CDC, and to answer any questions staff may have. This visit takes approximately two hours
- After completion of the enrollment/training visit, the immunization nurse will notify the department that your facility has been approved to order and receive VFC vaccines.
- VFC staff will notify the PA Statewide Immunization Information System (PA-SIIS) to provide the primary and back-up VFC coordinators with unique usernames and passwords referred to as “logon credentials.” This will allow staff to order vaccines online, update facility address and list vaccine shipping hours.

Provider Requirements

Any physician, health care organization or medical practice licensed by the state of Pennsylvania to prescribe and administer vaccines may enroll as a provider in the VFC program. Requirements for provider enrollment are simple, yet ensure accountability. Pa. VFC PPA (Section 6-B) details physician eligibility requirements for participation in the VFC program. By signing this agreement, the health care provider agrees that he/she has read, understands, and will comply with the following program requirements:

- Provide Pa. VFC program with accurate and valid email addresses for both VFC primary coordinator and backup coordinator;
- Notify Pa. VFC program of any changes in primary or backup coordinator email addresses;
- Update Pa. VFC program with patient population changes;
- Administer VFC program vaccines to VFC-eligible children;
- Retain all VFC documentation, including patient eligibility screening records, for a minimum of three years;
- Make immunization records available to the department, upon request and during CDC required site visits;
- Comply with the appropriate immunization schedule, dosage and contraindications established by the CDC's Advisory Committee on Immunization Practices (ACIP);
- Document and retain parent/guardian/individual refusal/rationale for not having client immunized
(<http://www2.aap.org/immunization/pediatricians/pdf/RefusaltoVaccinate.pdf>);
- Provide current vaccine information statements (VIS), maintain records in accordance with the National Childhood Vaccine Injury Act, and according to federal law, provide patients, or their parents or legal representatives, with the appropriate VIS whenever a vaccination is given
(<http://www.cdc.gov/vaccines/hcp/vis/index.html>);
- Not to impose a charge for the cost of the vaccine to any eligible patient;
- Not to impose a charge for the administration of the vaccine in any amount higher than the maximum fee of **\$23.14**;
- Not to deny administration of a vaccine to a child due to the inability of the child's parent/guardian/individual of record to pay an administrative fee;
- Comply with VFC program procedures and requirements; and
- Adhere to all federal and state requirements.

Provider Responsibilities

In addition to specific requirements needed to participate in the Pa. VFC program, specific responsibilities must be met as well. Those responsibilities consist of:

Notifying DOH regarding (Section 5):

- Change in facility name
- Change in facility address
- Change in facility telephone or fax number
- Change in primary VFC contact
- Change in back-up VFC contact
- Change in medical director/primary physician

Staff training (Section 4):

- Provide internal training on proper vaccine storage and handling guidelines;
- Provide internal training on vaccine administration protocols to each new employee at time of employment orientation and review annually; and
- Document these trainings and those who attended as required.

Developing and maintaining written procedures (Section 6-E):

- Emergency handling procedures
- Vaccine management plan
- Vaccine disaster recovery plan

Twice-daily temperature documentation (Section 6-H):

- Time when temperature was checked
- Initials of staff checking unit temperature
- Current, min, and max temperature
- Corrective action documentation on the temperature log (if needed)

Vaccine storage and handling (Section 4):

- CDC/DOH requirements/recommendations
- Equipment (refrigerators/freezers)
- Digital data loggers/continuous temperature monitoring systems
- Maintenance of cold chain.

Provider Annual Enrollment Update

In order to remain enrolled in the VFC Program and continue to receive VFC vaccines, it is mandatory to complete, sign and submit the Pa. VFC PPA annually. This document must be updated annually, or whenever there is a significant change in enrollment or when the physician who signed the Pa. VFC PPA leaves the practice. Provider sites

must complete the annual enrollment update online via the Pennsylvania Statewide Immunization Information System (PA-SIIS) website [Section 5].

- Keep a copy of the original Pa. VFC PPA.
- Document and forward all updates to the DOH as changes occur regarding staff with vaccine administration privileges.
- Fax, email or mail to the DOH.

A separate form must be completed for each site receiving vaccine. Failure to submit the annual enrollment update as directed by the Pa. VFC Program will result in suspension of vaccine ordering privileges and may lead to disenrollment.

Pa. VFC compliance site visits

At a minimum, a VFC compliance site visit will occur every other year at all Pa. VFC enrolled provider offices. Additional site visits will occur at the request of the provider for educational purposes or at the request of the DOH for programmatic issues, including unannounced site visits. The model used to achieve quality assurance in the Pa. VFC program is the Assessment, Feedback, Incentives and Exchange (AFIX) model. AFIX is a quality improvement strategy to raise immunization coverage rates and improve standards of practices at the provider level.

A **VFC compliance site visit** determines if Pa. VFC vaccines are being distributed, handled and administered according to the laws and policies that are part of the Pa. VFC program, which includes the following:

- Appropriate vaccine ordering procedures and accountability (Section 3);
- Appropriate vaccine storage and handling (Section 4);
- Proper documentation of children's Pa. VFC eligibility status;
- Sampling patient records to ensure appropriate Pa. VFC eligibility screening and documentation of VFC eligibility;
- Ensuring proper administration of Pa. VFC purchased vaccines only to Pa. VFC eligible children;
- Compliance with documentation and record-retention requirements;
- Proper use and documentation of the vaccine information statements (VIS), which must be offered to the parent/guardian prior to each immunization;
- Maintaining records of children who had an adverse reaction to a vaccine according to the National Childhood Vaccine Injury Act;
- Maintaining accurate inventory of vaccine lot numbers received and administered;
- Agreeing not to charge a vaccine administration fee that is higher than the maximum fee (**\$23.14**) established by the state;
- Agreeing not to charge for the cost of the vaccine; and

- Agreeing not to deny immunizations because of the parent's inability to pay a vaccine administration fee.

Providers not scheduled to receive a VFC compliance visit during the calendar year **must** be scheduled to receive training online, by webinar or through an in-person classroom style presentation (Section 4-7).

An **AFIX site visit** is needed to evaluate quality improvement activities, including the following:

- Assessing the provider's immunization coverage rates through an evaluation of patient immunization records for both Pa. VFC and non-Pa. VFC eligible patients;
- Providing feedback of performance data to clinicians and office staff to make them aware of their immunization practices; and
- Providing guidance to help staff diagnose service delivery problems, adopting interventions for improvement and producing information on the following:
 - Current Advisory Committee on Immunization Practices (ACIP) recommendations;
 - Valid contraindications to immunizations;
 - Record-keeping practices;
 - Patient flow sheets; and
 - Reminder/recall systems.

A **follow-up visit** is a contact/visit to the provider site to review progress after a recent site visit. Follow-up contacts/visits will continue until all issues are resolved.

An **annual provider training visit** is a visit to a Pa. VFC enrolled provider office to perform an educational information session. A Pa. VFC provider may request a Pa. VFC personnel training visit whenever the need arises. This is required for new staff at the practice site. All aspects of the VFC program are reviewed during an education visit. In addition, the Pa. VFC provider handbook is reviewed thoroughly with office staff during this visit.

Given the amount of funding and considerable resources that are invested in implementing and managing the Pa. VFC program, quality assurance site visits are important to evaluate whether the program is managed appropriately and is achieving the desired outcomes. Evaluation provides objective insight into a program and identifies opportunities to assess its impact, make improvements or build program capacity. For the Pa. VFC program, it is important to evaluate program processes and outcomes. The desired outcome of the Pa. VFC program is to ensure that viable vaccine is administered to eligible children.

Unannounced storage and handling visits are now a requirement from CDC. Unannounced visits are separate from the VFC compliance visits, and will serve as a spot check for proper storage and handling practices.

Withdrawing from the VFC Program

To ensure a smooth transition of services, the following steps must be taken in the event a facility chooses to discontinue participation in the Pa. VFC Program.

- **Notify the Pa. VFC program 30 days in advance at (1-888-646-6864)** if the office plans to dis-enroll or merge with another facility.
- Submit a complete inventory of all Pa. VFC vaccines on-site to include brand, lot number, expiration date and number of doses.
- Submit three months of temperature logs.
- Refer VFC-eligible children to another VFC Provider. If necessary, contact the DOH for help finding another VFC provider.

Fraud Waste and Abuse

The Pa. VFC Program recognizes that majority of VFC providers stand by their legal and professional duties and provide critical health care services to VFC patients every day. The Pa. VFC Program is committed to safeguarding federally funded vaccines by targeting fraud perpetrators and saving taxpayer dollars while reducing the burden on legitimate providers.

The comprehensive program to prevent and detect fraud, waste and abuse consists of:

- Procedures for the identification of potential fraud, waste and abuse in the Pa. VFC Program;
- A process to conduct a timely, reasonable review of potential violations of federal and state criminal, civil and administrative laws, rules and regulations; and
- A process to refer potential violations of federal and state criminal, civil and administrative laws, and violations of federal and state rules and regulations to law enforcement for further investigation within a reasonable period.

The goal of the Pa. VFC Program's fraud, waste and abuse initiative is to:

- **Prevent** fraud, waste and abuse before it occurs;
- **Detect** fraud, waste and abuse that is taking place; and
- **Report** suspected fraud, waste and abuse*

* Provider may be withdrawn from the VFC program if fraud and abuse is confirmed; the immunization nurse will retrieve all VFC vaccines at the time of withdrawal.

All Medical Assistance (MA) providers who suspect welfare fraud should call 1-800-932-0582.