



March 19, 2021

Elizabeth Richter
Acting Administrator
Centers for Medicare & Medicaid Services

Anne Marie Costello
Acting Deputy Administrator and Director
Center for Medicaid & CHIP Services

Tim Engelhardt
Director
Medicare-Medicaid Coordination Office
Centers for Medicare & Medicaid Services

Re: Request for MLTSS Plan Access to COVID-19 Vaccine Data for Dually Eligible Beneficiaries

Dear Administrator Richter, Deputy Administrator Costello, and Director Engelhardt:

On behalf of the Association for Community Affiliated Plans (ACAP), Medicaid Health Plans of America (MHPA), and the National MLTSS Health Plan Association,¹ we are writing to request that certain COVAX data regarding enrollees dually eligible for Medicare and Medicaid be made available to Managed Long-Term Services and Supports (MLTSS) plans, and to alert CMS to vaccine distribution concerns.

First, we would like to request that CMS allow MLTSS plans to request certain COVAX data² from CMS with information from Medicare fee-for-service regarding their enrollees dually eligible for Medicare and Medicaid. This information is already available to Medicare Advantage (MA) Plans, Regional Care Coordinated Plans (CCPs), Prescription Drug Plans (PDPs), and Medicare-Medicaid Plans (MMPs) and access to the same information system should be extended to Medicaid managed care plans, including MLTSS plans.

This data will be used to:

- Help ensure enrollees receive an initial COVAX dose when available to them as well as a second dose per clinical recommendation; and
- Inform health plan operations, including case management, care coordination, and/or population-based activities to improve the health of enrollees.

Given the relationship and frequency of contacts that MLTSS plans have with their members, including many dually eligible enrollees, MLTSS plans can—and, in some states, are expected to—play an important role in tracking and coordinating their members' receipt of a COVID-19

¹ www.communityplans.net; www.medicaidplans.org; www.mltss.org

² As noted in [this memo](#): “This data will include information needed for the plan to identify the beneficiary (name, Medicare Beneficiary Identifier, date of birth) and vaccine-specific information that will allow plans to meet their health care operations needs associated with the vaccine (date the vaccine was administered, the identifier for the administering provider, the National Drug Code for the vaccine given). Other information, such as whether a first or second dose was administered, a code indicating where the patient resides (private home, long term care facility, or other location) and the site where the vaccine was administered, if that information appeared on the pharmacy claim, will also be included.”

vaccine. It is of critical importance that MLTSS plans have the data they need to serve this high-need population during this time. The need for this data and ability to coordinate is heightened by the disproportionate impact the COVID-19 pandemic has had on beneficiaries dually eligible for Medicare and Medicaid. Based on CMS data³, dually eligible beneficiaries are hospitalized because of COVID-19 at nearly four times the rate of Medicare-only beneficiaries (1,199 hospitalizations per 100k beneficiaries compared to 278 hospitalizations per 100k beneficiaries). Moreover, recipients of home- and community-based services (HCBS) have an increased risk of mortality from COVID-19, with HCBS recipients aged 45-64 having a similar risk profile to the general population aged 65-74.⁴

We would also like to raise the importance of ensuring that enrollees are able to receive one or both doses of COVAX per clinical recommendation regardless of setting. Namely, we encourage you to prioritize and offer additional guidance on the vaccination of home-bound individuals. Some MLTSS members with complex needs cannot easily leave their homes, so the option to be vaccinated in the home is critical for this population.

We greatly appreciate CMS' efforts in this area, and we are happy to work with CMS on these issues as needed. If additional information would be helpful, please contact Mary Kaschak at mkaschak@mltss.org.

Sincerely,
National MLTSS Health Plan Association
Association for Community Affiliated Plans
Medicaid Health Plans of America

cc:
Sean McCluskie
Chief of Staff
Department of Health and Human Services

Jeffrey Zients
COVID-19 Response Coordinator
White House COVID-19 Response Team

Andy Slavitt
Senior Advisor
White House COVID-19 Response Team

³ Preliminary Medicare COVID-19 Data Snapshot. Accessed at <<https://www.medicaid.gov/sites/default/files/2019-12/ltssexpenditures2016.pdf>>

⁴ Elevated COVID-19 Mortality Risk Among Recipients of Home and Community Based Services: A case for prioritizing vaccination for this population. Accessed at: <<https://dredf.org/wp-content/uploads/2021/02/Vaccination-priority-for-HCBS-recipients-02-11-2021.pdf>>