

**CO**RONA**VI**RUS **D**ISEASE 2019   
(COVID-19)

**COVID-19 Registrations for Vaccinations**

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| **Audience:** Patient Access, MGPS, Laboratory, PBS, Revenue Integrity, HIM |
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| **COVID-19 Response Team Owner:** Finance |
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Trinity Health is committed to providing our patients with access to COVID-19 vaccinations. For patients presenting for vaccinations, our Patient Access colleagues are required to complete the full Registration process, which includes collecting patients' consent, full insurance, and complete demographic information.

**Separate individual encounters** will be created for first and second immunization services and patients will be registered under the same **patient type / class per local protocols for encounters solely for immunizations**.

**For insured patients**presenting for COVID-19 vaccination, copayments **should not be collected at the time of service**. Colleagues are expected to waive any possible co-pays/deductibles relating to vaccination encounters, adhere to normal registration protocols, and then select the plan code 'Insurance COVID-19' as payer of last resort on theaccount.  This will ensure Trinity Health is actively monitoring these insurance balances, as well as stopping self-pay balances from being billed to the patient inappropriately.

* **For colleagues with Trinity Health insurance coverage,** thePatient Access Team is expected to follow registration protocols outlined above, however, shouldn’t add the plan code ‘Insurance COVID-19’ as payer of last resort. The Team is required to register our colleagues as a patient of the facility and not under Employee Health Services (EHS).

**For self-pay patients**, Patient Access colleagues are expected to **continue to adhere to the Financial Assistance Policy** and are having an active dialogue with the patient about possible government assistance programs. To ensure the patient isn’t inappropriately billed for the vaccination encounter, Patient Access colleagues are expected to select the plan code ‘Self-Pay COVID-19’ as the payer of last resort.

* If it is determined that the patient qualifies for reimbursement under the **HRSA COVID-19 uninsured program**, colleagues are expected to follow the normal HRSA CVOID-19 Registration protocols as outlined by each Health Ministry.

For billing for vaccine/immunizations, the facility will charge using AMA approved coding, outlined in the ‘COVID-19 Vaccine Product and Administration Codes’ guidance.

These outstanding liabilities will then flow through the normal billing processes and it is the expectation that PBS colleagues will review balances after insurance to ensure the medical insurance carriers are processing the claims appropriately. As a reminder, **Trinity Health is only billing for administration services. Vaccination product codes will not be billed and will not fall on the claim *(only when the vaccination product is provided free of charge)*.** *We anticipate that initial vaccinations will be provided free of charge. Please stay in close contact with your local Pharmacy to understand when these vaccinations will be provided at cost. Please communicate this change to your Site Leadership when appropriate.*

* **\*Exception**: For patients with Medicare Advantage coverage, in alignment with CMS guidance, Trinity Health colleagues are required to register the patient with the appropriate **Medicare FFS plan**. *We are waiting for additional guidance on if the beneficiary ID number should be utilized with this plan.*