

TALKING POINTS

NAVIGATING EMPLOYER INQUIRIES ABOUT COVID-19 VACCINES



As a trusted community resource with experience administering COVID-19 vaccines to your own employees, it is likely that your facility will receive inquiries from local employers about vaccinating their employees. Below are some talking points to guide your discussions with employers seeking COVID vaccination assistance:

1

COVID-19 Vaccine Availability Is Being Rolled-Out in Phases

Phases will vary per state as not all states are following Centers for Disease Control and Prevention (CDC) recommendations. All full list of phases by state can be found at bit.ly/2MpUQjh. CDC has recommended the following phases and timing for the distribution of COVID vaccines¹:

Phase	Who
1a	- Frontline healthcare workers - Nursing home residents and staff
1b	- Adults age 75 and older Frontline essential workers²: - First responders (firefighters, police officers) - Education providers (teachers, support staff, daycare workers) - Food and agriculture workers - Manufacturing workers - Corrections workers - U.S. Postal Service workers - Public transit workers - Grocery store workers
1b	- Adults ages 65-74 - High-risk individuals ages 16-64 with underlying medical conditions Other essential workers²: - Transportation and Logistics - Food Service - Shelter and housing (construction) - Finance - Information technology and communications - Energy - Media - Legal
2	All people ages 16 and older who were not included in previous phases and are recommended for a vaccination.



2

Employers Can Mandate COVID-19 Vaccines

Employees working in certain industries, such as healthcare, will be required to get vaccinated. Private employers can also require employees to be vaccinated regardless of the industry they operate in. Two major exceptions that will generally preclude employers from requiring vaccinations include:

- **A medical condition that puts an employee at risk.** The employer will have to review the Americans with Disabilities Act (ADA) to determine whether a reasonable accommodation can be provided or whether having to provide this accommodation would constitute an undue hardship.
- **A bona fide religious objection.** It is up to the employer if they want to make an accommodation, but the obligation is not absolute.

3

Employers Must Follow Protocols Compliant with the Americans with Disabilities Act

Administering the vaccine to an employee, whether done by the employer or by a third party with whom the employer has contracted, does not constitute a medical examination for purpose of the ADA. However, if the employer or the contracted third-party ask screening questions prior to administering the vaccine, these questions are subject to ADA standards for disability-related inquiries.³ Screening questions asked by the employer or the contracted third-party must show that these questions are job-related and consistent with business necessity.

4

Employers Need Help with Administrative Processes

Employers who make COVID vaccination a requirement will need the appropriate administrative processes in place to enforce it. They will need verification that the employee has been vaccinated and received both doses (if a dual-dose vaccine) from the same manufacturer. Your organization can assist with these requirements by providing documentation that the employee can present to their employer. You can also provide vaccination reports to an employer who has provided an eligibility file. Providing proof that an employee has received a COVID-19 vaccine is not a disability-related inquiry and does not implicate the ADA³.



5

Employers Need Assistance Educating Employers and Building Trust

Employers will be looking for guidance on how to build support for the vaccine within their workforce. You can assist employers by sharing the educational materials provided to employees and patients at your facility. This includes links to your website, FAQ documents, posters and handouts. You may consider offering employers the opportunity to contract a dedicated nurse-triage line that would allow employees to call with questions or establish an on-site care clinic to provide vaccines and manage employee health needs.

Administering employee COVID vaccines also presents an opportunity for hospitals and health systems who are looking to build direct-to-employer relationships. By providing vaccine administration, member communication tools and easy reporting, health systems can develop partnerships that extend beyond the vaccination clinic. Caring for employees now will encourage employers to work with your facility to continue to provide care for their workforce.

Read more about how COVID has accelerated health system and employer partnerships at appliedhealth.net/covid-partnerships/.

6

Employers Will Need to Know the Differences Between the Vaccines

There are several manufacturers that are working on the development of a COVID vaccine. However, only two have been approved by the Federal Drug Administration (FDA) for Emergency Use Authorization (EUA) in the United States⁴:

- **Pfizer-BioNTech COVID-19 Vaccine:** This is the first vaccine that was approved by the FDA for EUA and is a two-dose regimen. After the first dose is administered, the second dose is administered in 21 days and must also be the Pfizer-BioNTech vaccine. The individual cannot receive a second dose from a different manufacturer.
- **Moderna COVID-19 Vaccine:** This is the second vaccine approved by the FDA for EUA. After the first dose is administered, the second dose is administered in 28 days and must also be the Moderna vaccine. The individual cannot receive a second dose from a different manufacturer.

Johnson & Johnson requested FDA EUA for the company's COVID-19 vaccine on February 4, 2021. The Johnson & Johnson vaccine is a single-dose regimen, and if approved, would be the only single-dose vaccine currently available. AstraZeneca is also working on a COVID vaccine that is expected to be submitted for FDA EUA in the United States in early 2021. The AstraZeneca COVID-19 Vaccine is also a two-dose regimen with the second dose administered 28 days after the first dose.

7

Costs

A. How Hospitals and Health Systems Will Be Reimbursed

Centers for Medicaid & Medicare Services (CMS) has identified CPT codes and reimbursement amounts for the administration of COVID-19 vaccines as follows⁵:

CPT Code	Short Descriptor	Manufacturer	Vaccine	Reimbursement
0001A	ADM SARSCOV2 30MCG/0.3ML 1ST	Pfizer-BioNTech	First Dose	\$16.94
0002A	ADM SARSCOV2 30MCG/0.3ML 2ND	Pfizer-BioNTech	Second Dose	\$28.39
0011A	ADM SARSCOV2 100MCG/0.5ML 1ST	Moderna	First Dose	\$16.94
0012A	ADM SARSCOV2 100MCG/0.5ML 2ND	Moderna	Second Dose	\$28.39
0021A	ADM SARSCOV2 5X10 [^] 10VP/.5ML 1	AstraZeneca	First Dose	\$16.94
0022A	ADM SARSCOV2 5X10 [^] 10VP/.5ML 2	AstraZeneca	Second Dose	\$28.39

When a single-dose vaccine is approved by the FDA, the payment allowance will be \$28.39 for the single-dose regimen.

B. Cost to Employers

Employees will not have to pay out of pocket for the vaccine, even if they are not covered by their employer's health insurance. Co-pays and deductibles will not apply to COVID-19 vaccines. However, the employee may be charged for an office visit if they receive their vaccine at a provider's office or at a clinic. You may want to advise the employer to check with their insurer about potential charges.

If your facility is using bMetrix™ for COVID-19 vaccine administration, the cost will be \$5.26 for a single-dose regimen, and \$1.38/pp for the first dose and \$1.88/pp for the second for a dual-dose regimen. You may want to factor these costs into what your facility will be charging the employer for vaccine administration.

About bMetrix™ for COVID-19 Vaccine Distribution and Reporting

bMetrix™
Screenings. Vaccines. Reporting. Simplified.

How bMetrix Helps Hospitals and Health Systems

bMetrix will allow for hospitals and health systems to easily track COVID-19 vaccination data. bMetrix significantly reduces the time spent on vaccination administration by eliminating the need for paper and allowing for preset parameters that reduce setup time.

bMetrix offers features to help speed vaccination administration and accurately record data:

- **Customizable:** Offers the ability to customize workflows and set vaccine parameters, reducing setup time, expediting vaccine administration and ensuring data accuracy.
- **Data Interoperability:** Connects vaccination data to EMRs and state registries in compliance with state and federal reporting requirements.
- **Versatile:** Ability to document and report a variety of encounters and vaccine types, including COVID-19 and influenza.
- **Member Communication:** Informs members or groups of members about vaccination events and second dose information through email, all within a single platform.
- **Invoicing:** Tracks member vaccinations for single and dual-dose regimens for billing of federally allowed administration fees.



How bMetrix Helps Employers

bMetrix makes it easy for hospitals and health systems to help employers vaccinate and track vaccine data for their employees. Employers can be set-up quickly in the bMetrix application using an eligibility file and vaccination reports can be easily downloaded to track employee vaccination progress.

Employers can send emails to employees notifying them of upcoming vaccination events and allow them to easily register online. Employees who do not pre-register can still register on-site at the screening event via bMetrix check-in. bMetrix tracks which employees have received the first dose and sends reminders about the second dose.

bMetrix offers solutions to assist in vaccinating an employer's workforce:

- **Vaccine Registration:** Members can pre-register for vaccination events via an eligibility file or register on-site.
- **Member Communication:** Emails can be sent to individuals or groups regarding vaccination events and second dose administration.
- **Easy Reporting:** Vaccination data is easily downloaded in a CSV report that can be provided to the employer to determine who has and has not been vaccinated, and is connected to EMRs to update the employee's record at the health system level.
- **Member Education:** Ability to disseminate important second dose vaccination information.



Learn more about the bMetrix COVID-19 Vaccine Injection Management, Member Communication and Reporting application at appliedhealth.net/covid-vaccine/.

Building Partnerships With Applied Health Analytics

Applied Health Analytics can help create a strategic plan to reach employers who are looking for expert guidance on vaccine administration. Once the partnership is formed, Applied Health Analytics links proprietary risk analytics and engagement technology with health system resources to offer employers a complete array of evidence-based, early detection and prevention initiatives. Utilizing Applied Health Analytics' technology, employers can identify high-risk conditions that are prevalent in their employee population and create wellbeing programs to address these health needs. Learn more at appliedhealth.net.

References

¹ Center for Disease Control and Prevention The Advisory Committee on Immunization Practices' Updated Interim Recommendation for Allocation of COVID-19 Vaccine, January 1, 2021

² Cybersecurity & Infrastructure Security Agency, CISA Release Updated Guidance On Essential Critical Infrastructure Workers, August 18, 2020

³ U.S. Equal Employment Opportunity Commission, What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws, December 16, 2020

⁴ U.S. Food & Drug Administration, COVID-19 Vaccines, December 2020

⁵ Centers for Medicare & Medicaid Services, COVID-19 Vaccines and Monoclonal Antibodies, January 19, 2021