



North Carolina Department of Health and Human Services
Division of Public Health – Women’s & Children’s Health Section
1917 Mail Service Center • Raleigh, North Carolina 27699-1917
Tel 919-707-5550 • Fax 919-870-4824

Michael F. Easley, Governor

Dempsey Benton, Secretary

December 31, 2008

MEMORANDUM

TO: Universal Childhood Vaccine Distribution Program (UCVDP) Participants

FROM: Beth Rowe-West, R.N., B.S.N., Head,
Immunization Branch

SUBJECT: Policy on Replacement and Borrowing from UCVDP Vaccine Supplies

The purpose of this memo is to alert providers to the policy on replacement and borrowing of UCVDP vaccine supplies. UCVDP provides all required vaccines and most recommended vaccines at no cost to providers in North Carolina for administration to eligible patients. The contractual obligation is that providers will administer state-supplied vaccine products according to the most current coverage criteria. The coverage criteria document outlines eligibility criteria based on the patient’s age, insurance status, and any additional criteria for each UCVDP vaccine. The *UCVDP Coverage Criteria* is updated periodically, and the current version is available on the Immunization Branch web site at: <http://www.immunizenc.com/Providers.htm>

All UCVDP vaccines administered outside of the stated coverage criteria must be replaced with privately purchased vaccine.

Borrowing vaccines

All UCVDP providers are expected to maintain an adequate inventory of privately purchased vaccine for their ineligible patients. Providers must purchase and maintain a separate inventory for patients who are not eligible for state-supplied vaccines as outlined in the coverage criteria. The CDC requires that providers are able to physically distinguish between their public and private vaccine stock. Providers may not borrow vaccine if it leaves your practice without adequate state-supplied vaccine to vaccinate all eligible children.

Borrowing should occur only when there is a lack of private-stock vaccine due to unexpected circumstances such as:

- delayed vaccine shipment,
- vaccine spoiled in-transit,
- inexperienced staff who calculated ordering time incorrectly.

Providers may not use their state-supplied vaccine supply as a vaccine bank in lieu of responsible ordering practices for private supply. **Borrowing of UCVDP vaccine should be a rare event, not a routine occurrence.** Attached is a sample completed form and blank form, required by the CDC, for use in the event that borrowing is necessary. **Effective January 1, 2009**, providers must complete this form and return it to the Immunization Branch within 30 days of borrowing state-supplied vaccine or discovering that a dose was mistakenly administered.

Replacement procedures

If a provider inadvertently administers state-supplied vaccine to patients who do not meet the criteria, the provider must replace these vaccines by purchasing the same number of doses. In order to properly manage inventory and document doses administered, providers using the North Carolina Immunization Registry (NCIR) must contact the Help Desk whenever adding replacement lots of vaccine into their public supply. Providers should be aware that UCVDP may request that they validate the replacement of state-supplied vaccine by requesting a copy of the provider’s invoice for private stock vaccine used to replenish borrowed state-supplied vaccine. Because there is no mechanism to accept monetary reimbursement for vaccine, providers must replace vaccine dose-for-dose.

Vaccines currently available only to children who meet VFC eligibility criteria are: human papillomavirus (HPV) vaccine, meningococcal conjugate vaccine (MCV4), pneumococcal conjugate vaccine (PCV7), and rotavirus vaccines. All other vaccines are available regardless of the child's insurance status. Since January 11, 2008, UCVPD providers may administer **all** state-supplied vaccines to **underinsured** children. Previously, only federally qualified health centers and rural health centers could administer state-supplied HPV, rotavirus, and meningococcal vaccines to underinsured children.

If state-supplied vaccine is intentionally provided to non-eligible children for other than the reasons listed above, this action may constitute fraud and abuse and may be subject to penalties under federal law.

Questions should be addressed to Janie Ward-Newton, 919-707-5578.

| | | | | |
|-----|----------|------------------------|-----------------------|---------------|
| CC: | SMT | NC Immunization Branch | NCIB Field Services | Steve Shore |
| | Joy Reed | Ann Nance | Vaccine Manufacturers | Maelyn Powell |

Filename: Borrowingreplacementmemodraft

North Carolina Universal Childhood Vaccine Distribution Program (UCVDP) Vaccine Borrowing Report

Guidance:

UCVDP-enrolled providers are expected to maintain an adequate inventory of vaccine for their non-UCVDP-eligible patients. UCVDP vaccine cannot be used as a replacement system for a provider's privately purchased vaccine inventory. The provider must assure that UCVDP vaccine supply is adequate to meet the needs of the provider's UCVDP-eligible patients and that borrowing UCVDP vaccine will not prevent a UCVDP-eligible child from receiving a needed vaccination because UCVDP vaccine was administered to a non-UCVDP-eligible child. Borrowing would occur only when there is lack of private-stock vaccine due to unexpected circumstances such as a delayed vaccine shipment, vaccine spoiled in-transit to provider, or new staff that calculated ordering time incorrectly. The reason cannot be provider planned borrowing from UCVDP stock.

Directions for use of this form:

When a provider has borrowed UCVDP vaccine for administration to a non-UCVDP-eligible child, this form must be **COMPLETELY FILLED OUT** for each non-UCVDP-eligible child receiving a UCVDP vaccine. **Each UCVDP vaccine a child receives must be listed on a separate row.** As soon as the borrowed doses of UCVDP vaccine are replaced by private stock vaccine, the form must be faxed to the immunization program, and the provider should keep a copy of the completed form in the office records. For questions about this form or the Replacement and Borrowing from UCVDP Vaccine Supplies Policy, please contact Janie Ward-Newton at 919-707-5578.

Attention: **Janie Ward-Newton**

Fax Number: **800-544-3058**

Time period of / / to / /

Clinic/Provider Name:

Office Contact Name:

Telephone Number/ fax:

E-mail address:

PIN:

| Vaccine Borrowed | Patient Name/Patient Identifier | DOB | Date Borrowed | Reason no private stock vaccine was available (circle one) | Date vaccine returned to UCVDP stock |
|------------------|---------------------------------|-----|---------------|--|--------------------------------------|
| | | | | 1 Private stock order shipment delayed 2 Private stock order non-viable on arrival 3 other (specify) | |
| | | | | 1 Private stock order shipment delayed 2 Private stock order non-viable on arrival 3 other (specify) | |
| | | | | 1 Private stock order shipment delayed 2 Private stock order non-viable on arrival 3 other (specify) | |
| | | | | 1 Private stock order shipment delayed 2 Private stock order non-viable on arrival 3 other (specify) | |

"I hereby certify, subject to penalty under the False Claims Act (31 U.S.C. § 3730) and other applicable Federal and state law, that UCVDP vaccine dose borrowing and replacement reported on this form has been accurately reported and conducted in conformance with Vaccines For Children (VFC) provisions for such borrowing (<http://www.cdc.gov/vaccines/programs/vfc/operations-guide.htm>) and further certify that all UCVDP doses borrowed during the noted time period have been fully reported on this form."

Provider Name: _____ Date: _____
 Provider Signature: _____

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Attention: Janie Ward-Newton

Fax Number: 800-544-3058

Time period of 10/19/2007 to 10/21/2007

Clinic/Provider Name: ABC Clinic

Office Contact Name: Suzie Que

Telephone Number/ fax: 555-444-2211/555-444-9889

E-mail address: Que@abc.com

PIN: 999997

- For each UCVDP vaccine borrowed all information in that row of the table must be completely filled out
- It is acceptable to use " " to indicate the above child received another UCVDP vaccine as long as the additional vaccines are identified
- It is also acceptable for each UCVDP vaccine borrowed and administered to an individual to complete all information in each row of the table
- Circle or write in reason for no private stock was available

| Vaccine Borrowed | Patient Name/Patient Identifier | DOB | Date Borrowed | Reason no private stock vaccine was available | Date vaccine returned to UCVDP stock |
|------------------|---------------------------------|-------------|---------------|---|--------------------------------------|
| DTaP | Shirley Temple | 08/01/20007 | 10/19/2007 | 1. Private stock order shipment delayed 2. Private stock order non-viable on arrival 3. other (specify) | 10/21/2007 |
| IPV | " " | " " | " " | 1. Private stock order shipment delayed 2. Private stock order non-viable on arrival 3. other (specify) | 10/21/2007 |
| DTaP | Mickey Rooney | 08/15/2007 | 10/19/2007 | 1. Private stock order shipment delayed 2. Private stock order non-viable on arrival 3. other (specify) | 10/21/2007 |
| IPV | Mickey Rooney | 08/15/2007 | 10/19/2007 | 1. Private stock order shipment delayed 2. Private stock order non-viable on arrival 3. other (specify) | 10/21/2007 |

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"Provider Name: Dr. Sam Who Provider Signature: [Signature] Date: 10/21/2007