

Dosage-based Assessment Refund Policy

Background:

The WVA Assessment Grid lists the dosage-based assessments for vaccines included in the state's Childhood Vaccine Program. The WVA Board approved an update to the current Assessment Grid dated 6/28/2010 at its March, 2011 meeting. The updated grid reduces vaccine assessment levels for dates of service on or after 6/1/2011. Notice of the update was sent to providers and payers on 4/1/2011 and posted prominently on the WVA website. The issue presented is whether payers could request and would be issued a refund where systems had not been changed to pay at the reduced amounts. A limited number of refunds are performed in the normal course of WVA operations for reasons related to patient eligibility or billing/payment errors.

Purpose:

The purpose of this policy is to clarify that the WVA will not issue refunds for payments made at assessment levels based on the assessment grid in effect prior to 6/1/2011. This is a one-time policy addressing the specific situation of the reduction in vaccine assessment levels after the WVA's startup year. It is not intended to have any precedential role going forward or for any other purpose at this time.

Policy:

The WVA will not issue refunds to health carriers or TPAs for overpayments that result from failing to apply the updated, reduced assessments as of 6/1/2011 for dates of service on or after 6/1/2011, and continuing to use the assessment levels based on the grid dated 6/28/2010.

Rationale:

- Providers and payers have had adequate notice of the updated vaccine assessments and effective dates through several channels, including a DOH blast fax and WVA email alert as well as an announcement on the WVA home page. If this policy is approved, a statement will be added to the website language on the update to the assessment grid clarifying that no refunds will be made in this instance.
- The WVA consulted with payers and providers prior to launching implementation of the new assessment rates and received input that the notification timeline was sufficient for the new rates to be loaded into systems and operationalized.
- Feedback received through consultations suggested that there were strong incentives for payers to change their payment levels and refund requests would be infrequent.

- WVA operates efficiently and with minimum resources. Payers and TPAs send checks for hundreds of vaccine assessments at a time to the WVA. The operational cost to refund a specific payer's overpayment would be a resource and time-intensive process for the WVA.

Support for Policy:

- This policy has been discussed by the WVA Operations Team, WVA staff, and the WVA Board.
- It was approved by the WVA Operations team on 5/12/2011.