

Alabama VFC Borrowing Policy

Purpose: To explain the process to replace Vaccines for Children (VFC) vaccine when VFC provided vaccine is administered to an ineligible patient.

With proper screening for all patients receiving VFC vaccine at every visit, there should be no instances in which an ineligible patient receives VFC vaccine. However, the Alabama VFC Program is aware that there are rare instances when providers inadvertently administer VFC purchased vaccine to ineligible children. When this occurs, providers must replenish the VFC stock on a dose per dose basis. Monetary reimbursement to the program is not allowed. Borrowing should only occur when there is a lack of appropriate stock vaccine due to unexpected circumstances such as a delayed vaccine shipment, vaccine spoiled in-transit to provider, or new staff who miscalculates ordering time.

When replacing vaccine used for an ineligible patient, the provider shall follow the Alabama VFC policy on borrowing, which is as follows: After notifying the Alabama VFC Program, borrowing between the two inventories of vaccines may occur but should be a rare occurrence. According to the Health and Human Services (HHS) Office of the Inspector General (OIG), excessive borrowing, failure to repay borrowed vaccine, and refusal to carry vaccine per needs of clientele is subject to reporting of fraud and abuse.

Federal fraud and abuse laws apply to the entire VFC program.

- **Fraud:** An intentional deception or misrepresentation made by a person with the knowledge that the deception could result in some unauthorized benefit to himself or some other person. It includes any act that constitutes fraud under applicable federal or state law.
- **Abuse:** Provider practices that are inconsistent with sound fiscal, business, or medical practices and result in an unnecessary cost to the Medicaid program (and/or including actions that result in an unnecessary cost to the immunization program, a health insurance company, or a patient); or in reimbursement for services that are not medically necessary or that fail to meet professionally recognized standards for healthcare. Abuse also includes recipient practices that result in unnecessary cost to the Medicaid program.

(For additional information on Fraud and Abuse, please refer to the Fraud, Abuse, and Wastage Policy online at <http://www.adph.org/immunization/assets/VFCFraudandAbusePolicy.pdf>).

Please note: For seasonal influenza vaccine, providers may use private stock seasonal influenza vaccine to vaccinate VFC eligible children if VFC seasonal influenza stock is not yet available. Those private stock doses used on VFC eligible children can later be replaced when VFC stock becomes available. This one-directional borrowing exception is unique to seasonal influenza vaccine.

For all other vaccines except influenza, limited borrowing may occur bi-directionally, but only under the following circumstances and after first consulting with the Alabama VFC Program.

- When borrowing vaccine:
 1. Every time a VFC vaccine is borrowed, the provider must complete the VFC Vaccine Borrowing Report. The provider must document the reason why the vaccine was borrowed, must document the date the vaccine was replaced, and when the inventory was made whole. Once the borrowed VFC vaccine is replaced with private stock vaccine, that date should be entered on the form and the completed form saved and submitted with a copy of the invoice to the Alabama VFC Program for review. Providers will keep the completed reports in a file for review during VFC Site Visits.
 2. VFC vaccine cannot be used as a replacement system for a provider's privately purchased vaccine inventory. Borrowing between the two vaccine inventories must be a rare, unplanned occurrence. Borrowing can occur only when there is lack of private-stock vaccine due to unexpected circumstances such as delayed vaccine shipment, vaccine spoilage, in-transit to provider, or new staff that miscalculated ordering time.
 3. Two-way borrowing can be used by a VFC-enrolled provider with a patient population that is mostly VFC-eligible and has only a small number of privately insured children in order to prevent loss of privately purchased vaccine due to expiring vaccine. Privately purchased vaccine that is short dated may be "borrowed" and administered to a VFC-eligible child and the borrowed dose replaced with a longer-dated VFC dose. This borrowing may occur to prevent vaccine loss due to the vaccine reaching the expiration date. Please remember that this type of "borrowing" must be documented on the VFC Borrowing Report that is an attachment to this policy.
 4. The Alabama VFC Program will follow-up with providers who have multiple episodes of vaccine borrowing in a single year (the exception is for providers who are borrowing short-dated vaccine to prevent loss of vaccine), and the follow-up will include an assessment of the immunization delivery system within the practice or VFC program to determine if changes must be implemented to eliminate the need for frequent borrowing of vaccine.

This policy speaks specifically to the borrowing of vaccine and not to the transfer of vaccine between provider's sites. The transport of vaccine by providers from one clinic to another is strongly discouraged by the Alabama VFC program. If a provider has vaccine that needs to be transported from one clinic to another because their practice has multiple locations and one location is out of a particular vaccine, please contact the local Immunization Manager or Outreach Manager and then review and educate your staff on current practice policies to ensure that adequate vaccine stock is available for the patients of that practice.

Any questions regarding this policy should be directed to the Alabama VFC Program at (866) 674-4807.