



Medi-Cal Rx

# Commercial Paxlovid™ Reimbursement and Update on Billing for Pharmacists Prescribing Paxlovid

January 17, 2024; Updated January 18, 2024

## Background

The Department of Health Care Services (DHCS) is providing the following policy update and billing guidance to pharmacy providers about Paxlovid™ (nirmatrelvir and ritonavir tablets), approved or authorized by the U.S. Food and Drug Administration (FDA) for the treatment of COVID-19 when independently initiated and furnished by a pharmacist, and about the commercialization of Paxlovid.

## What Pharmacy Providers Need to Know

On May 25, 2023, the FDA approved the use of Paxlovid for the treatment of adults at high risk of progression to severe COVID-19. Paxlovid is still available through an FDA Emergency Use Authorization (EUA) for the treatment of mild-to-moderate COVID-19 in non-hospitalized adolescents from 12 to 17 years of age and weighing  $\geq 40$  kg.

## Commercialization

On October 13, 2023, Pfizer, the manufacturer of Paxlovid, reached an agreement with the federal government on a timeline to transition Paxlovid from government-managed EUA-Paxlovid distribution to traditional commercial distribution. The commercial transition began on November 1, 2023, as the federal government began to discontinue the distribution of Pfizer's EUA-Paxlovid. Pfizer provided New Drug Application (NDA)-labeled commercial supply to all channels by the end of 2023.

Commercial NDA-labeled Paxlovid is now a covered Medi-Cal Rx benefit for claims with dates of service (DOS) on or after November 1, 2023. Pharmacy providers are encouraged to submit retroactive claims if applicable.

Pharmacy providers will be reimbursed the ingredient cost for commercialized products. The professional dispensing fee will be reimbursed for both NDA and EUA-labeled products. Claims for the dispensing fee and ingredient cost should be billed to Medi-Cal Rx.

## Extension of Temporary Allowance to Bill for Prescribing Paxlovid Under Pharmacist Services

DHCS had previously made a temporary allowance to reimburse pharmacists for the prescribing (consultation and assessment of need for treatment) of Paxlovid when performed in accordance with the California State Board of Pharmacy (BOP) Waiver and the FDA's EUA. This allowed pharmacies to bill DHCS on a medical claim for prescribing Paxlovid under Pharmacist Services, using CPT codes 99202 (new patient) and 99212 (existing patient), until the end of the COVID-19 public health emergency (PHE) on May 11, 2023. **DHCS is extending this temporary allowance through September 30, 2024.**

Paxlovid may be prescribed for an individual member by a state-licensed pharmacist for the treatment of mild-to-moderate COVID-19 in adults and pediatric members (12 years of age and older, weighing at least 40 kg) who are at high risk for progression to severe COVID-19, including hospitalization or death, in accordance with the FDA-approved Prescribing Information or authorized labeling, as applicable, and subject to the conditions specified by the FDA.

### Important Billing Instructions

- DHCS will reimburse the ingredient cost for the commercialized NDA-labeled Paxlovid. The ingredient cost will not be reimbursed for the EUA-labeled products.
- The professional dispensing fee will be reimbursed for both NDA and EUA-labeled products.
  - Claims for reimbursement of the professional dispensing fee and ingredient cost must be submitted to **Medi-Cal Rx** for processing.

### Claims Submission to DHCS for Prescribing

- DHCS will continue to reimburse pharmacists for the prescribing (consultation and assessment of need for treatment) of all Paxlovid products.
  - Claims must continue to be billed to **DHCS** as a medical claim on a *CMS-1500* form as a Pharmacist Service using CPT codes 99202 (new patient) and 99212 (existing patient); the claim will be reimbursed with the current methodology for pharmacist services found in the [Pharmacist Services](#) section of the [DHCS Provider Manual \(Part 2 – Pharmacy\)](#).
    - Eligible claims must have an ICD-10-CM diagnosis code, U07.1 (COVID-19).
    - DHCS is extending the temporary allowance to allow billing with these CPT codes from the end of the PHE (May 11, 2023) through September 30, 2024.

## Retroactive Claims Processing

- DHCS will reprocess all claims with DOS on or after May 12, 2023, until policy implementation for these CPT codes.
- DHCS will reprocess all claims for the reimbursement of ingredient cost for commercialized products for DOS on or after November 1, 2023. Pharmacy providers are encouraged to resubmit claims from November 1, 2023, to December 20, 2023.

Any concerns regarding delay in reimbursement should not cause pharmacy providers to decline dispensing Paxlovid to members.

## Resources

Pharmacy providers should refer to the following resources:

- [\*California Department of Public Health – COVID-19 Treatment Resources for Healthcare Providers\*](#)
- [\*Paxlovid – nirmatrelvir and ritonavir: Full Prescribing Information\*](#)
- [\*Fact Sheet for Healthcare Providers: Emergency Use Authorization for Paxlovid™\*](#)
- [\*Fact Sheet for Patients, Parents, and Caregivers: Emergency Use Authorization \(EUA\) of Paxlovid for Coronavirus Disease 2019 \(COVID-19\)\*](#)
- [\*Paxlovid \(nirmatrelvir co-packaged with ritonavir\): A Preferred Oral Antiviral Drug to Treat COVID-19\*](#)

For more information on services covered by Medi-Cal Rx, pharmacy providers should refer to the [Medi-Cal Rx Web Portal](#).

## Contact Information

You can call the Medi-Cal Rx Customer Service Center (CSC) at 1-800-977-2273, which is available 24 hours a day, 7 days a week, 365 days per year.

For other questions, email Medi-Cal Rx Education & Outreach at [MediCalRxEducationOutreach@primetherapeutics.com](mailto:MediCalRxEducationOutreach@primetherapeutics.com).