# CONTENTS

1. **Overview of the VFC Program** ......................................................................................................... 4  
   Vaccines for Children (VFC) .................................................................................................................. 4  
   Advisory Committee On Immunization Practices (ACIP) ................................................................. 4  
   VFC and I-CARE in Illinois ..................................................................................................................... 5  
   Fee Caps on Vaccine Administration ................................................................................................... 5  

2. **Eligibility** ................................................................................................................................... 6  
   VFC Eligibility Criteria .......................................................................................................................... 6  
   VFC Eligibility Hierarchy ..................................................................................................................... 10  
   Provider Responsibility to Screen for VFC Eligibility ...................................................................... 13  

3. **Provider Enrollment** ................................................................................................................. 16  
   Program Participation Overview ...................................................................................................... 16  
   Enrollment .......................................................................................................................................... 20  

4. **Vaccine Management** ............................................................................................................... 23  
   Vaccine Cold Chain ............................................................................................................................ 23  
   Day-To-Day Vaccine Management .................................................................................................... 26  
   Borrowing Vaccines ............................................................................................................................ 27  
   Equipment Types ................................................................................................................................ 27  
   Temperature Monitoring .................................................................................................................... 32  
   Vaccine Management Plan ................................................................................................................. 40  
   Temporary Off-Site Vaccine Clinics .................................................................................................... 41  

5. **Vaccine Loss and Replacement** .................................................................................................. 44  
   Definitions ........................................................................................................................................... 44  
   Situations Requiring Vaccine Replacement ........................................................................................ 44  
   Situations Not Requiring Vaccine Replacement .................................................................................. 46  
   Procedures For Vaccine Replacement ................................................................................................ 47  
   Procedure to Appeal a Vaccine Replacement .................................................................................... 47  

6. **Accountability** .......................................................................................................................... 49  
   VFC Vaccine Orders ............................................................................................................................ 49  
   Procedures For Returning Nonviable Vaccine to McKesson Specialty .............................................. 51  
   Provider-to-Provider Transfer of Vaccines ......................................................................................... 55  
   Provider Moving to a New Location ................................................................................................... 59  
   VFC Provider Unenrollment .............................................................................................................. 60  

7. **VFC Site Visits** .......................................................................................................................... 61  
   VFC Compliance Visit ......................................................................................................................... 61  
   Storage and Handling Site Visit .......................................................................................................... 62  
   Conducting the Site Visit .................................................................................................................... 62  
   Following Up After the Site Visit ......................................................................................................... 63
8. Fraud and Abuse ...................................................................................................................................... 64
   Overview .............................................................................................................................................. 64
   Fraud and Abuse Policy ........................................................................................................................ 65
   Examples of Fraud and Abuse .............................................................................................................. 65
   Allegations of Suspected Fraud and Abuse ......................................................................................... 66
   Fraud and Abuse Contacts.................................................................................................................. 67
   Ongoing Provider Monitoring Procedures ........................................................................................ 67
   Reporting VFC Provider Terminations ............................................................................................... 68

Appendices ........................................................................................................................................... 69
   VFC Eligibility Status Codes .............................................................................................................. 70
   VFC Tip Sheet – Certificate Calibration Expiration Dates ................................................................. 71
   VFC Tip Sheet – Transfer Contact Log .............................................................................................. 73
   VFC Tip Sheet – Transfer Provider Report ........................................................................................ 75
   VFC Tip Sheet – Vaccine Information Statement Documentation ................................................... 76
   Glossary of Important VFC Terms .................................................................................................... 80
1. OVERVIEW OF THE VFC PROGRAM

The Vaccines for Children (VFC) program is a federally-funded program from the Centers for Disease Control and Prevention (CDC) that provides vaccines at no cost to children who might not otherwise be vaccinated because of an inability to pay. The benefits of the VFC program include:

- Reducing referrals of children from private providers to state health departments for vaccination.
- Saving VFC-enrolled providers out-of-pocket expenses for vaccine.
- Eliminating or reducing vaccine cost as a barrier to immunizing eligible children.

VFC providers contribute to increased immunization coverage level rates and reduced delays in immunizations and, subsequently, the risk of serious illness or death from vaccine-preventable diseases.

The Illinois Department of Public Health (the Department) administers the VFC program to provide immunizations for children through the age of 18 who are uninsured (“self-pay”), Medicaid Title XIX (19)-eligible, American Indian or Alaskan Native. Underinsured children (children who have limited coverage or caps on the amount of vaccines allowed annually) can access VFC vaccines recommended by the CDC’s Advisory Committee on Immunization Practices (ACIP) at participating federally qualified health centers (FQHC) and rural health clinics (RHC), or local health departments (LHD) under an approved deputization agreement. All VFC providers must offer all ACIP-recommended vaccines for the populations they serve.

Children who have Medicaid “Title XXI [21]” or “State funded” coverage (as shown in MEDI in the “Special Information” section) are NOT eligible for VFC vaccines. These children have the State’s Child Health Insurance Program (CHIP) coverage and are considered fully insured. VFC providers must privately purchase vaccines for administration to children with CHIP insurance and seek reimbursement from the Illinois Department of Healthcare and Family Services (HFS) or the HFS Managed Care Organization.

This program manual is intended for providers currently enrolled in the Illinois VFC program. Providers located within the City of Chicago should contact the Chicago Department of Public Health via phone (312-746-6050) or e-mail (ChicagoVFC@cityofchicago.org).

Note: In Illinois, the state does not require parental or guardian consent for vaccination. Local administrators of clinics and/or health departments may require consent under local agency guidance. However, CDC and the Department view required consent as a possible barrier to vaccination. Provision of a vaccine information statement (VIS) must be routinely provided prior to vaccinating.

ADVISORY COMMITTEE ON IMMUNIZATION PRACTICES (ACIP)

The Advisory Committee on Immunization Practices (ACIP) is a federal advisory committee that was established in 1964 to provide advice and guidance on the most effective means to prevent vaccine-preventable diseases. In 1993, Congress gave the ACIP unique legal authority to determine recommendations for the routine administration of vaccines to children and adults in the civilian population. The ACIP is the only entity in the federal government that makes such recommendations.
These recommendations include:

- Age for vaccine administration
- Number of doses and dosing interval
- Precautions and contraindications

Major functions of the ACIP are as follows:

- Develops technical recommendations on vaccine use and immunization practices.
- Approves vaccines to be provided through the VFC program.
- Recommends immunization schedules that are harmonized with recommendations of other advisory groups, such as the American Academy of Pediatrics (AAP) and the American Academy of Family Physicians (AAFP).

**VFC AND I-CARE IN ILLINOIS**

The Illinois Immunization Section requires VFC providers to be enrolled and active users of the Illinois Comprehensive Automated Immunization Registry Exchange (I-CARE). Additional information and forms for I-CARE are available at [http://www.dph.illinois.gov/topics-services/prevention-wellness/immunization/icare](http://www.dph.illinois.gov/topics-services/prevention-wellness/immunization/icare). The Immunization Section has integrated its VFC enrollment and vaccine management functions into I-CARE. This integration allows for greater accountability and programmatic oversight.

All Illinois VFC providers must provide individual patient immunization records on how each VFC vaccine was administered. The individual patient immunization records can either be manually entered directly into I-CARE or can be electronically transmitted to I-CARE from the provider’s electronic medical record (EMR) system. VFC providers not in compliance will not be able to continue participating in the VFC program.

**FEE CAPS ON VACCINE ADMINISTRATION**

Illinois VFC providers may charge a vaccine administration fee for non-Medicaid Title XIX (19) VFC-eligible children only. Providers are not allowed to bill VFC eligible children for the cost of the VFC vaccine. As of January 1, 2013, the vaccine administration fee may not exceed the administration fee cap of $23.87 per vaccine dose. The administration fee must be waived if the parent cannot afford to pay it.
2. **ELIGIBILITY**

**VFC ELIGIBILITY CRITERIA**

Providers must screen for and document VFC eligibility with every visit. Before administering vaccines, providers must check the eligibility status in the Illinois Department of Healthcare and Family Services (HFS) MEDI system ([http://www.illinois.gov/hfs/MedicalProviders/EDI/medi/Pages/default.aspx](http://www.illinois.gov/hfs/MedicalProviders/EDI/medi/Pages/default.aspx)) or risk non-payment from HFS.

Provider forms are available in I-CARE under “Immunization Links” or under the “Vaccines” tab in “Reports.” To be eligible to receive VFC vaccine, children (regardless of their state of residency) through the age of 18 (under 19) and meet at least one of the following criteria:

- **Medicaid-eligible**: a child who is eligible for the Medicaid Title XIX (19) program. (For the purposes of the VFC program, the terms “Medicaid-eligible” and “Medicaid-enrolled” are equivalent and refer to children who have health insurance covered by Medicaid Title XIX [19]).
- **Uninsured**: a child who has no health insurance coverage. (May also be referred to as “Self-Pay”.)
- **American Indian or Alaskan Native (AI/AN)**: as defined by the Indian Health Care Improvement Act (25 U.S.C. 1603).
- **Underinsured**:
  1. A child who has health insurance, but the coverage does not include vaccines, or
  2. A child whose insurance does not cover all Advisory Committee on Immunization Practices (ACIP)-recommended vaccines. The child would be eligible to receive those vaccines not covered by the insurance.

* Underinsured children are eligible to receive VFC vaccine only through a federally qualified health center (FQHC), rural health clinic (RHC), or local health department (LHD) under an approved deputized agreement.

* With the implementation of the Affordable Care Act (ACA), it is rare for a child to meet the underinsured eligibility criteria for the VFC program. Therefore, unless insurance coverage for vaccines is verified by the provider prior to administration of vaccine, for the purposes of the VFC program, these children are considered insured and not eligible to receive VFC vaccines at that immunization encounter.

* Children whose health insurance covers the cost of vaccinations are **not** eligible for VFC vaccines. This applies even when a claim for the cost of the vaccine and its administration would be denied for payment by the insurance carrier because the plan’s deductible had not been met.

**STATE’S CHILD HEALTH INSURANCE PROGRAM (CHIP)**

Children who have Medicaid “Title XXI [21]” or “State funded” coverage (as shown in MEDI in the “Special Information” section) are NOT eligible for VFC vaccines. These children have the State’s Child Health Insurance Program (CHIP) coverage and are considered fully insured. VFC providers must privately purchase vaccines for administration to children with CHIP insurance and seek reimbursement from HFS or the HFS Managed Care Organization.
If the patient has:

<table>
<thead>
<tr>
<th>If the patient has:</th>
<th>VFC Eligible for VFC vaccines</th>
<th>PRIVATLY PURCHASED Administer privately purchased vaccines.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title XIX (19) – Medicaid and the patient is 18 years or younger (until the day before their 19th birthday)</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Title XIX (19) – Medicaid and the patient is 19 years or older</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Title XXI (21) – CHIP</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>State-Funded – CHIP</td>
<td>No</td>
<td>Yes</td>
</tr>
</tbody>
</table>

The chart shown above lists the different eligibility types through Medicaid and what type of vaccines should be used.

- **Medicaid Title XIX (19) patients who are through age 18** (until the day before their 19th birthday): VFC eligible. VFC vaccines should be administered and providers should bill HFS or the managed care organization for the administration fee.

- **Medicaid Title XIX (19) patients who are 19 years or older**: NOT VFC eligible. Privately purchased vaccines must be administered and bill HFS or the managed care organization for the vaccines and administration.

- **Medicaid patients with either Title 21 or State Funded**: NOT VFC eligible. Providers should administer their privately purchased vaccines and bill HFS or the managed care organization for the vaccines and administration.

**Other eligibility notes:**

- Any patient 19 years of age or older is NOT eligible for VFC vaccines.

- If the patient is 18 years of age or younger and has private insurance that covers all vaccines, the patient is fully insured and NOT VFC eligible.

- If the patient is 18 years of age or younger and the private insurance does not cover vaccines or does not cover all ACIP recommended vaccines, the patient is UNDERINSURED and VFC eligible for the vaccines not covered by insurance. The patient would need to go to a VFC enrolled Federally Qualified Health Center, Rural Health Clinic, or a local health department that has been deputized by a FQHC.

More information on the CHIP program and MEDI is available on the HFS website at [https://www.illinois.gov/hfs/MedicalProviders/NonInstitutional/Pages/default.aspx](https://www.illinois.gov/hfs/MedicalProviders/NonInstitutional/Pages/default.aspx). Some of the information provided includes:

- MEDI Webinar and Registration Screens
- MEDI Registration Screens
- Vaccination Billing Instructions
• Pediatric Vaccine Reimbursement Rates
• VFC Webinar Slides (pdf)
• MEDI Example Slides (pdf)
• Vaccination Questions and Answers (pdf)

Additional HFS website links:

• Claims processing system issues:  
  https://www.illinois.gov/hfs/MedicalProviders/SystemIssues/Pages/default.aspx
• Fee schedules:  
  https://www.illinois.gov/hfs/medicalproviders/MedicaidReimbursement/FeeSchedule/Pages/2016FeeSchedule.aspx
• New releases:  
  https://www.illinois.gov/hfs/MedicalProviders/notices/pages/default.aspx

HFS contact phone numbers:

• Policy and billing questions:  877-782-5565 or 217-782-5565
• Report of MEDI being down:  Automated Voice Response System (AVRS) at 800-842-1461
INSURANCE OR HEALTH COST-SHARING PLAN

For the purpose of the VFC program, “insurance” is defined as a plan that is:

- Regulated by a State’s Insurance Commissioner and/or
- Subject to the Employee Retirement Income Security Act of 1974 (ERISA). ERISA is a federal law that sets minimum standards for most voluntarily established pension and health plans in private industry to provide protection for individuals in these plans.

The Illinois Department of Insurance regulates insurance plans in Illinois. The Illinois Insurance Code (215 ILCS 5/4) states that the insurance laws do not apply to arrangements between a religious organization and the organization’s members when twelve specific criteria are met. The criteria is listed in the insurance code 215 ILCS 5/4 at http://www.ilga.gov/legislation/ilcs/ilcs4.asp?DocName=021500050HArt%2E%2E+I%2E+ActID=1249%2E+ChapterID=22&SeqStart=100000&SeqEnd=1000000. If an organization meets all of the criteria listed in the code, the health plan is not a certified insurance plan in Illinois. If this is the only health coverage the child has and the child is 18 years of age or younger, the child would be uninsured and eligible for VFC vaccines.

The Illinois Department of Insurance website provides information on health insurance plans that are regulated at http://insurance2.illinois.gov/applications/RegEntPortal/ to see if the company is a certified insurance plan. On the Illinois Department of Insurance’s website for the company profile search, select “General information” and enter the name of the company in the field provided. Tip: Enter a partial name instead of the full company name to expand your search.

- If the company IS listed, check to see if they have been issued a National Association of Insurance Commissioner’s (NAIC) number.
  - If the company has a NAIC number, check their status. If the company is active, this is a certified insurance plan in Illinois.
    - A child through age 18 would be considered as insured and NOT VFC eligible (unless the insurance plan does not cover any immunizations or does not cover ACIP recommended vaccines, the child would be considered “underinsured” and eligible for vaccines from a FQHC/RHC or deputized LHD).
- If the company is NOT listed or does not have a NAIC number, the company is probably NOT a regulated insurance plan in Illinois.
  - If the organization meets all of the criteria listed in the Illinois Insurance Code, the health plan is not a certified insurance plan in Illinois. If this is the only health coverage the child has and the child is 18 years of age or younger, the child would be uninsured and eligible for VFC vaccines.

For more information about specific health cost-sharing plans, contact the Department of Insurance. Their contact information is available at http://insurance.illinois.gov/main/Contact.asp.
### VFC Eligibility Scenario

<table>
<thead>
<tr>
<th>VFC Eligibility Scenario: Child is Insured and...</th>
<th>Insurance Status</th>
<th>Is Child VFC Eligible?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Has not yet met plan’s deductible</td>
<td>Insured</td>
<td><strong>No, not VFC eligible</strong></td>
</tr>
<tr>
<td>Grandfathered plan that does not cover all ACIP recommended vaccines</td>
<td>Underinsured</td>
<td><strong>Yes, only for vaccines not covered by plan</strong></td>
</tr>
<tr>
<td>Seeking contraceptive or sexually-transmitted disease (STD) services at school-based clinic or facility whose main services are primary or acute care and wants to be immunized but does not want to access insurance.</td>
<td>Insured</td>
<td><strong>No, not VFC eligible</strong></td>
</tr>
<tr>
<td>Seeking contraceptive or STD services at family planning clinic or STD clinic and wants to be immunized but does not want to access insurance or doesn’t know status.</td>
<td>Uninsured</td>
<td><strong>Yes, VFC eligible</strong></td>
</tr>
<tr>
<td>Incarcerated child where the state does not supply vaccine for incarcerated individuals and the child cannot access health care through a health insurance plan because of incarceration.</td>
<td>Uninsured</td>
<td><strong>Yes, VFC eligible</strong></td>
</tr>
<tr>
<td>Enrolled in separate Children’s Health Insurance Program (CHIP Title XXI [21] or State Funded)</td>
<td>Insured</td>
<td><strong>No, not VFC eligible</strong></td>
</tr>
<tr>
<td>Children through age 18 enrolled in a Medicaid Title XIX (19) program</td>
<td>Medicaid eligible</td>
<td><strong>Yes, VFC eligible</strong></td>
</tr>
</tbody>
</table>

The only children considered “Underinsured” are those insurance plans that do not cover vaccines or do not cover all ACIP recommended vaccines. An insurance plan with a high deductible, a plan with coverage limited to a specific number of provider visits annually, or a plan where the child has exceeded the annually allowed number of visits are insured. These children are **NOT** considered underinsured and are **NOT** VFC eligible.

### VFC Eligibility Hierarchy

Providers must screen, document VFC eligibility, and verify Medicaid eligibility in MEDI at each immunization visit before administering vaccines. Occasionally, children may be eligible for VFC vaccine in two different categories. Providers should always choose the option that requires the least amount of out-of-pocket expenses to the parent/guardian. Providers should always verify insurance coverage prior to administering vaccines.

The VFC program does not allow the borrowing of VFC vaccine. The VFC program cannot support a policy that permits borrowing of VFC vaccine for use in non-eligible children. Private vaccine used on VFC patients cannot be paid back using VFC vaccine. Similarly, VFC vaccine cannot be used in non-eligible children and then paid back with private stock. If VFC vaccine is unavailable, the provider
should reschedule the child or refer the VFC eligible child to a local health department for vaccination.

**INSURED CHILDREN WITH MEDICAID TITLE XIX (19) AS SECONDARY INSURANCE**

Situations occur where children may have private health insurance and Medicaid Title XIX (19) as secondary insurance. These children will be VFC-eligible as long as they are enrolled in Medicaid Title XIX (19). However, the parent is not required to participate in the VFC program. There are options for the parent and provider. These options are described below:

- **Option 1:** A provider can administer VFC vaccine to these children and bill the Medicaid agency for the administration fee.
- **Option 2:** A provider can administer private stock vaccine and bill the primary insurance carrier for both the cost of the vaccine and the administration fee.

A child should be screened for VFC eligibility as having Medicaid if the child is covered by a high deductible insurance plan requiring the parent to pay out-of-pocket for vaccines until the deductible has been reached, **AND** the child has Medicaid Title XIX (19) as secondary insurance:

- The child should be considered VFC-eligible if the family has not reached its deductible yet and has Medicaid Title XIX (19) as secondary insurance. VFC vaccine should be administered, and the administration fee billed to Medicaid until the deductible is reached.

**Children with Medicaid Title XXI (21) or State Funded CHIP insurance are NOT VFC eligible.**

**INSURED CHILDREN WITHOUT MEDICAID AS A SECONDARY INSURANCE**

Children whose health insurance covers the cost of vaccinations are not eligible for VFC vaccines, even when a claim for the cost of the vaccine and its administration would be denied for payment by the insurance carrier because the plan's deductible had not been met. Privately insured children, even those without a medical home, cannot be vaccinated with VFC vaccine by any VFC provider site – even an FQHC or RHC. These children must be vaccinated with privately-acquired vaccine.

The following common scenarios **do not qualify** patients for access to VFC vaccine:

- Children whose insurance plans maintain high deductible rates that deny provider payment claims for the cost of the vaccine and its administration when the plan's deductible (high deductible plan) has not been met.
- Children whose insurance plan caps coverage at a certain dollar amount or a number of allowable provider visits.
- Children whose insurance plans cover all ACIP-recommended childhood vaccines, but exclude certain combination vaccines or certain products. A child with this type of coverage would be considered insured and **NOT** eligible for VFC because all recommended vaccines are covered.
- Children whose insurance plans cover a portion of the cost of the vaccine, even though it may be only a small portion of the cost of the vaccine. These children are considered insured and **NOT** eligible for VFC vaccine.
### MINORS AT FAMILY PLANNING CLINICS

<table>
<thead>
<tr>
<th>POPULATION</th>
<th>INSURANCE STATUS</th>
<th>VFC ELIGIBILITY UNINSURED</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minors under 19 years of age</td>
<td>Do not know their insurance status and who present at family planning clinics for contraceptive services or STD treatment</td>
<td>Considered <strong>uninsured</strong> for the purposes of the VFC program</td>
</tr>
<tr>
<td>A person under 19 years of age</td>
<td>May have insurance, but because of the confidential circumstances of seeking services in a family planning clinic, does not have access to that insurance coverage</td>
<td>Considered <strong>uninsured</strong> for the purposes of the VFC program</td>
</tr>
<tr>
<td>Juveniles under the age of 19 years who are incarcerated in detention facilities</td>
<td>Loses access to his or her health insurance because of the incarceration</td>
<td>Considered <strong>uninsured</strong> and VFC-eligible</td>
</tr>
</tbody>
</table>

CDC defines a family planning clinic as a clinic or provider whose purpose is to prescribe contraceptives and/or treat sexually transmitted diseases. **School-based clinics or any VFC-enrolled provider whose main services are primary or acute care services do not meet CDC’s definition of a family planning clinic and cannot use this VFC eligibility category.**

**Note:** In Illinois, the state does not require parental consent for adolescents who wish to be vaccinated against hepatitis B and/or human papillomavirus (HPV). Local clinic and/or health department administrators may require consent under local agency guidance. However, CDC and the Department view consent as a possible barrier to vaccination. A vaccine information statement (VIS) must routinely be offered upon vaccination.

### AI/AN WITH HEALTH INSURANCE THAT COVERS IMMUNIZATIONS

American Indian/Alaskan Native (AI/AN) children through 18 years of age (under 19 years of age) are always VFC-eligible. VFC is an entitlement program and participation is not mandatory for an eligible child. For AI/AN children who have full immunization benefits through a primary private insurance, the decision to participate in the VFC program should be made based on what is financially most cost advantageous to the child and family.

### JUVENILES IN CORRECTIONAL FACILITIES

If a child under 19 years of age loses access to their health insurance because of incarceration, the child is considered uninsured and VFC-eligible.

### STATE OF RESIDENCY
At times, VFC-eligible children receive health care in a bordering state instead of their state of residency. VFC eligibility is not dependent upon state of residency for the child. Illinois providers enrolled in the VFC program may vaccinate children who are VFC-eligible, but reside in another state. Providers must be aware if VFC vaccines are administered to a Medicaid Title XIX (19) VFC-eligible child from a neighboring state, the provider must be a Medicaid enrolled provider for the state where the Medicaid Title XIX (19) VFC-eligible child resides in order to receive reimbursement for the administration fee from that state’s Medicaid program.

**PROVIDER RESPONSIBILITY TO SCREEN FOR VFC ELIGIBILITY**

Screening to determine a child’s eligibility to receive vaccines through the VFC program must take place with each immunization visit. The Patient Eligibility Screening Record developed by the Department provides a means of recording parent response to VFC eligibility questions. The provider, parent, or guardian may complete the VFC eligibility portion of the form. Verification of parent/guardian responses is not required. If providers elect not to use the Department’s tool, a separate screening form must be used. Providers must correctly document VFC eligibility in I-CARE for each dose of vaccine administered.

Providers using electronic medical records (EMRs) to document* vaccinations must have the capability to enter VFC eligibility status, all of the criteria from the Patient Eligibility Screening Record, the eligibility in which the patient qualifies at each immunization visit, and vaccine lot numbers on a per dose basis.

*All VFC program related documentation, including eligibility screening, vaccine temperature log reports, and vaccine order documentation, must be retained for three years.

Before administering vaccines, providers must check eligibility status and type of Medicaid coverage in the Illinois Department of Healthcare and Family Services (HFS) MEDI system (http://www.illinois.gov/hfs/MedicalProviders/EDI/medi/Pages/default.aspx) or an equivalent system receiving HFS 270/271 electronic transaction data.

**VFC ELIGIBILITY DECISION CHART**

The following eligibility chart will assist in determining if a patient is eligible to receive VFC vaccines.
## VFC Eligibility Status

<table>
<thead>
<tr>
<th>Insurance Type</th>
<th>VFC Eligibility Scenario</th>
<th>Insurance Status</th>
<th>Is Child VFC-Eligible?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Any</td>
<td>Patient is 19 years of age or older</td>
<td>Not Eligible</td>
<td>No, administer private vaccines (V01)</td>
</tr>
<tr>
<td>Any</td>
<td>American Indian/Alaskan Native UNDER 19 years of age</td>
<td>Eligible</td>
<td>Yes (V04)</td>
</tr>
<tr>
<td>Any</td>
<td>Cannot access health insurance due to being incarcerated and patient is UNDER 19 years of age</td>
<td>Uninsured</td>
<td>Yes (V02 or V03)</td>
</tr>
<tr>
<td>None</td>
<td>Patient is UNDER 19 years of age and is paying cash for health care due to not having private insurance or Medicaid</td>
<td>Uninsured</td>
<td>Yes (V03)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Insurance Type</th>
<th>VFC Eligibility Scenario for Children UNDER 19 Years of Age</th>
<th>Insurance Status</th>
<th>Is Child VFC-Eligible?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Private insurance only</td>
<td>Plan covers all ACIP recommended vaccines</td>
<td>Insured</td>
<td>No, administer private vaccines (V01)</td>
</tr>
<tr>
<td></td>
<td>Plan does not include vaccine coverage</td>
<td>Underinsured</td>
<td>Yes, at FQHC, RHC or deputized LHD only (V05)</td>
</tr>
<tr>
<td></td>
<td>Plan does not cover all ACIP recommended vaccines</td>
<td>Underinsured</td>
<td>Yes, at FQHC, RHC or deputized LHD only, eligible for vaccines not covered by insurance (V05)</td>
</tr>
<tr>
<td></td>
<td>Plan has high deductible</td>
<td>Insured</td>
<td>No, administer private vaccines (V01)</td>
</tr>
<tr>
<td></td>
<td>Has not met the plan’s deductible or met copays for other services received at visit</td>
<td>Insured</td>
<td>No, administer private vaccines (V01)</td>
</tr>
<tr>
<td></td>
<td>Coverage caps the number of allowable provider visits</td>
<td>Insured</td>
<td>No, administer private vaccines (V01)</td>
</tr>
<tr>
<td></td>
<td>Coverage is capped at a certain dollar amount</td>
<td>Insured</td>
<td>No, administer private vaccines (V01)</td>
</tr>
<tr>
<td></td>
<td>Seeking contraceptive or sexually-transmitted disease (STD) services at school-based clinic or facility whose main services are primary or acute care and wants to be immunized but does not want to access insurance</td>
<td>Insured</td>
<td>No, administer private vaccines (V01)</td>
</tr>
<tr>
<td></td>
<td>Seeking contraceptive or STD services at family planning clinic or STD clinic and wants to be immunized but does not want to access insurance or doesn’t know status</td>
<td>Uninsured</td>
<td>Yes (V03)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Insurance Type</th>
<th>VFC Eligibility Scenario for Children UNDER 19 Years of Age</th>
<th>Insurance Status</th>
<th>Is Child VFC-Eligible?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Private insurance AND Medicaid secondary</td>
<td>Private insurance AND Medicaid Title XIX (19) secondary</td>
<td>Insured</td>
<td>Two Options: A: Yes, Administer VFC and bill Medicaid for admin fee (V02) B: No, Administer private vaccines and bill insurance (V01)</td>
</tr>
<tr>
<td></td>
<td>Private insurance AND Medicaid Title XXI (21) or State Funded secondary</td>
<td>Insured</td>
<td>No, administer private vaccines (V01)</td>
</tr>
<tr>
<td></td>
<td>Private insurance with a high deductible not yet AND Medicaid Title XIX (19) secondary</td>
<td>Medicaid Eligible</td>
<td>Yes, until the deductible is reached (V02)</td>
</tr>
<tr>
<td></td>
<td>Private insurance with a high deductible not yet AND Medicaid Title XXI (21) or State Funded secondary</td>
<td>Insured</td>
<td>No, administer private vaccines (V01)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Insurance Type</th>
<th>VFC Eligibility Scenario for Children UNDER 19 Years of Age</th>
<th>Insurance Status</th>
<th>Is Child VFC-Eligible?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Medicaid only (verified in MEDI)</td>
<td>Has Title XIX (19) Medicaid</td>
<td>Eligible</td>
<td>Yes (V02)</td>
</tr>
<tr>
<td></td>
<td>Has Title XXI (21) or State-Funded Medicaid (CHIP)</td>
<td>Insured</td>
<td>No, administer private vaccines (V22)</td>
</tr>
</tbody>
</table>
## VFC Eligibility Scenario for Children UNDER 19 Years of Age

<table>
<thead>
<tr>
<th>Insurance Type</th>
<th>VFC Eligibility Scenario for Children UNDER 19 Years of Age</th>
<th>Insurance Status</th>
<th>Is Child VFC-Eligible?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other</td>
<td>Has a religious-based health cost sharing plan that is not regulated or certified by the Illinois Department of Insurance</td>
<td>Uninsured</td>
<td>Yes (V03)</td>
</tr>
</tbody>
</table>

### NOTES

At each immunization encounter, providers are required to screen patients and document eligibility status. It is the responsibility of providers to screen patients to ensure that fully insured patients or patients 19 years of age and older do not receive federally-supplied VFC vaccine. Providers should encourage patients to review insurance benefits when scheduling and have staff check benefits. If a patient arrives for an appointment and is still unsure of vaccine coverage, vaccination should be deferred until insurance coverage question(s) can be answered.

Before administering vaccines, providers must check the eligibility status in the MEDI system (or an equivalent system receiving HFS 270/271 electronic transaction data) or risk non-payment from HFS.

If the MEDI system shows “Title XXI [21]” or “State funded” coverage for the date of service, the child is NOT eligible for VFC vaccines. VFC providers must administer privately purchased vaccines to fully insured children, which includes children with CHIP Medicaid Title XXI or State funded insurance. The provider will need to seek reimbursement from HFS or the HFS Managed Care Organization.

Underinsured children include only those children who meet one of the following conditions:

1. Insurance coverage does not include any vaccinations or
2. Does not allow all ACIP recommended vaccines.

Once those criteria are reached, the underinsured child can receive the vaccines not covered by insurance VFC vaccine only at a federally qualified health center (FQHC), rural health clinic (RHC) or a local health department (LHD) deputized by a FQHC or RHC to serve the underinsured. These children are only underinsured for the vaccines not covered.

Patients who have insurance coverage with any of the following are NOT underinsured and cannot receive VFC vaccines:

1. Only covers a portion of vaccine cost;
2. Has high deductibles;
3. Does not cover combination vaccines;
4. Coverage caps the number of allowable provider visits; or
5. Coverage is capped at a certain dollar amount.
3. PROVIDER ENROLLMENT

All VFC providers must enroll in the VFC program on an annual basis. VFC providers are required to register to use the Illinois Comprehensive Automated Immunization Registry Exchange (I-CARE), a tool used by health care providers, parents, public health agencies, and schools to record and promote immunization records. The VFC program utilizes I-CARE for the VFC program.

Annual enrollment for the VFC program is submitted through I-CARE. Enrollment forms are completed in I-CARE with an enrollment confirmation page to be signed and faxed or e-mailed to the Department, along with certificates of calibration for all data loggers.

Providers who are new to the VFC program will need to complete the I-CARE application first. Information and forms for enrollment in I-CARE are available at [http://www.dph.illinois.gov/topics-services/prevention-wellness/immunization/icare](http://www.dph.illinois.gov/topics-services/prevention-wellness/immunization/icare). Providers may contact the I-CARE team at DPH.ICARE@illinois.gov to check the status of an I-CARE enrollment application.

### PROGRAM PARTICIPATION OVERVIEW

<table>
<thead>
<tr>
<th>REQUIREMENT</th>
<th>DESCRIPTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>Enrollment</td>
<td>All VFC providers participating in the VFC program must submit an annual enrollment. VFC vaccines are to be delivered directly to VFC clinic location on file in the current enrollment. VFC vaccines may not be redistributed or shared with non-VFC providers. VFC vaccines may only be transferred to another VFC provider with IDPH’s approval before the transfer. Refer to the VFC Transfer Approval Request Form in I-CARE for more information on transferring vaccines.</td>
</tr>
<tr>
<td>Clinic Location</td>
<td>VFC providers planning to move their clinic to a new location must notify the immunization program before the clinic moves so the equipment and plan to transport the VFC vaccines may be reviewed and approved. Contact the VFC program by clicking on “Contact Us” in I-CARE and selecting “VFC Illinois” as the category or by telephone at 217-786-7500.</td>
</tr>
<tr>
<td>I-CARE</td>
<td>All VFC providers must participate in the Immunization Information System known as Illinois Comprehensive Automated Immunization Registry Exchange (I-CARE). I-CARE is administered by the Illinois Department of Public Health as authorized by the Immunization Data Registry Act, 410 ILCS 527. Participation will include, but not be limited to, documenting patient records with VFC eligibility criteria and administration data for all VFC shots provided, VFC vaccine inventory, temperatures of refrigerators and freezers storing or containing VFC vaccines, primary and back-up data logger certificate of calibration information, and routine use of the VFC vaccine ordering system.</td>
</tr>
<tr>
<td>Medical Director</td>
<td>The VFC enrollment forms must be signed annually by the medical director or the equivalent in a group practice. The health care provider signing the agreement must be a practitioner authorized to administer pediatric vaccines under state law. The practitioner will also be held accountable for compliance by the entire organization and its VFC providers with the responsible conditions outlined in the Provider Enrollment Agreement. The medical director’s medical license number and individual National Provider Identifier (NPI) number must be listed on the VFC enrollment form. Any change to the medical provider during the enrollment year must be communicated immediately to the VFC program by clicking on “Contact Us” in I-CARE and selecting “VFC Illinois” as the category or by telephone at 217-786-7500.</td>
</tr>
<tr>
<td>Additional Providers</td>
<td>VFC providers must identify any additional medical providers at the facility who will be administering vaccines. The medical license number and individual’s NPI number must be listed on the enrollment form.</td>
</tr>
<tr>
<td>Designation of key clinical staff</td>
<td>VFC providers must designate a primary vaccine coordinator and at least one backup vaccine coordinator(s) who will both be fully trained to oversee and manage the clinic’s vaccine supply. The VFC program prefers to have an office manager, RN, NP, PA, or MD as the primary vaccine coordinator. The contact name and information for each vaccine coordinator must be current in the clinic’s profile in I-CARE. Any personnel changes in this role must be immediately reported to the VFC program through the “contact us” link in I-CARE.</td>
</tr>
</tbody>
</table>
### Completion of VFC Educational Requirements

All VFC vaccine coordinators are required to complete and maintain documentation of receiving annual VFC education on vaccine storage and handling. Education is available through VFC compliance site visits, VFC trainings, or through CDC online training, “You Call The Shots – Module 10 – Storage and Handling,” available at [http://www2a.cdc.gov/nip/isd/ycts/mod1/courses/sh/ce.asp](http://www2a.cdc.gov/nip/isd/ycts/mod1/courses/sh/ce.asp). You will need to register for continuing education credits to receive a certificate of completion. Training should also be documented in the Vaccine Management Plan on the training log.

### VFC Eligibility Screening & Documentation

Screening for VFC eligibility must occur with all clinic patients 0 to 18 years of age, prior to vaccine administration and must have VFC eligibility screening documented in the patient’s permanent medical record (paper-based or electronic medical record) at each immunization encounter. Before administering vaccines, providers must check the eligibility status in the Illinois Department of Healthcare and Family Services (HFS) MEDI system (or an equivalent system receiving HFS 270/271 electronic transaction data) or risk non-payment.

The VFC eligibility screening form is available in I-CARE on the home page under “Immunization Links.” Eligibility documentation must be kept in the patient’s medical record for three years. Documentation of eligibility screening must include the following elements:

- Date of screening
- Whether the patient is VFC eligible or not VFC eligible
- If VFC eligible, the eligibility criteria the patient met

VFC vaccines may only be administered to children who are 18 years of age or younger who meet one or more of the following eligibility categories.

1. Are an American Indian or Alaska Native;
2. Are enrolled in Medicaid (Title XIX [19] only);
3. Have no health insurance;
4. Are underinsured: A child who has health insurance, but the coverage does not include vaccines; a child whose insurance covers only selected vaccines (VFC-eligible for non-covered vaccines only).

Underinsured children are eligible to receive VFC vaccine only through a Federally Qualified Health Center (FQHC), or Rural Health Clinic (RHC) or under an approved deputization agreement.

The location of the child’s residence is not a factor in eligibility.

**Children who have Medicaid “Title XXI [21]” or “State funded” coverage (as shown in MEDI in the “Special Information” section) are NOT eligible for VFC vaccines.** These children have the State’s Child Health Insurance Program (CHIP) coverage and are considered fully insured. VFC providers must privately purchase vaccines for administration to children with CHIP insurance and seek reimbursement from HFS or the HFS Managed Care Organization.

For information on CHIP or the MEDI system, please contact the Illinois Department of Healthcare and Family Services (HFS). The main HFS website is [https://www.illinois.gov/hfs/Pages/default.aspx](https://www.illinois.gov/hfs/Pages/default.aspx). The HFS medical provider’s page is at [https://www.illinois.gov/hfs/MedicalProviders/NonInstitutional/Pages/default.aspx](https://www.illinois.gov/hfs/MedicalProviders/NonInstitutional/Pages/default.aspx). Here are some phone numbers listed on the HFS website that may provide assistance:

- Provider billing hotline: 217-782-5565
- Claims Processing: 217-782-0472
- All Kids: 217-524-7156
- Provider Help Line: 800-804-3833

### Vaccines

Providers must agree to comply with immunization schedules, dosages, and contraindications that are established by the Advisory Committee on Immunization Practices (ACIP) and included in the VFC program unless:

- In the provider’s medical judgment, and in accordance with accepted medical practice, the provider deems such compliance to be medically inappropriate for the child;
- The particular requirements contradict state law, including laws pertaining to religious and other exemptions.
Providers must offer all VFC vaccines for the patient population served within their clinic. Vaccines with limited use (such as PPV23 and pediatric Td) may be ordered in single dose increments and made available to VFC-eligible children at provider practices serving age groups eligible for these vaccines.

**Vaccine Information Statements (VIS)**

VFC providers must distribute the current Vaccine Information Statements (VIS) each time a vaccine is administered and maintain patient records in accordance with the National Childhood Vaccine Injury Act (NCVIA), which includes reporting clinically significant adverse events to the Vaccine Adverse Event Reporting System (VAERS). To be considered compliant with the NCVIA, each patient record must contain ALL of the elements listed below:

1. Address of clinic where vaccine was administered
2. Name of vaccine administered
3. Date vaccine was administered
4. Date VIS was given
5. Publication date of VIS
6. Name of vaccine manufacturer
7. Lot number
8. Name and title of person who administered the vaccine

**VFC Vaccine Administration Fees**

VFC providers may charge VFC-eligible children not covered by Medicaid Title XIX (19) a vaccine administration fee up to $23.87 per dose (not antigen) of vaccine. VFC providers may not exceed the federal maximum administration fee nor may they charge non-Medicaid VFC-eligible children for the cost of the vaccine. VFC vaccine administration should not be denied because the child’s parent/guardian/individual of records is unable to pay the administration fee.

**Vaccine Ordering and Accountability**

Adequate vaccine supply must be maintained in accordance with practice patient population. Providers should maintain enough VFC inventory for at least one (1) month, but inventory should not exceed three (3) months.

VFC vaccine supply, 317-funded vaccines, and private vaccines (include privately purchased vaccines for CHIP children) must be kept separate from other vaccine inventory and clearly labeled to allow easy identification and to prevent misuse of VFC or 317 vaccines on ineligible patients. **The vaccines do not have to be stored in separate storage units, but must be separated from other vaccine stock and clearly labeled.**

All VFC documentation, including temperature logs, are required to be kept for a period of at least three (3) years. All VFC providers must report patient immunization records in I-CARE on the administration of VFC vaccines. The patient-level data may either be directly entered into I-CARE or providers may work with their EMR vendor to have data electronically transferred. If you need assistance with your electronic transmission, click on “Contact Us” in I-CARE and select “HL7” as the category.

**Storage Equipment**

Vaccine must be stored in one of the following equipment types:

A. Pharmaceutical/medical grade refrigerator/freezer
B. Stand-alone refrigerator (household or commercial)
C. Stand-alone refrigerator (pharmaceutical/medical grade)
D. Stand-alone freezer (household or commercial)
E. Stand-alone freezer (pharmaceutical/medical grade)

**Household combination refrigerator/freezers are not allowable for the storage of VFC vaccines.**

**Dormitory-style or bar-style refrigerators are not allowable to store VFC vaccine at any time, even for temporary storage.** Dormitory-style refrigerators do not maintain proper temperatures and pose a high risk of freezing vaccine. A dormitory-style refrigerator is defined as a combination refrigerator/freezer unit that is outfitted with one exterior door that upon opening will expose a freezer compartment within the refrigerator. A dormitory-style unit may be a small unit that sits on top of or under the counter. A dormitory-style unit may also be an older household-size refrigerator with one outside door and the freezer door located within the refrigerator.
| **Data loggers** | Providers are required to have a data logger in each unit, with at least one back-up data logger available on-site. CDC recommendation is for the use of a digital data logger with a detachable probe in a buffered material (e.g., glycol) with continuous monitoring capabilities. The temperature should be easily readable from the outside of the unit. Additional recommended features include:
  - Alarm that actively notifies the provider of out-of-range temperatures
  - Current, minimum, and maximum temperatures
  - Viewable low battery indicator
  - Capability of ± 1°F (0.5°C) accuracy
  - Memory stores at least 4,000 readings; device will not write over old data – stops recording when memory is full; and
  - Equipped with user programmable logging interval (or reading rate) of 15 minutes or less.

**Routine downloading and review of the temperature data from the data logger, such as on a weekly basis, is critical for determining whether vaccine has been properly stored and for assessing usability of vaccine that was involved in an excursion.** |
| **Data logger Calibration & Certification** | Primary and back-up data loggers must have a certification of calibration that is current (no more than two years since last calibration testing or based on the manufacturer’s recommended re-testing timeline). A valid certificate of calibration must be kept on file, submitted with the annual enrollment, and be readily available for review during VFC visits. Certificate of calibration expiration dates must be kept up-to-date in I-CARE as certificates expire and are re-calibrated or replaced.

**The certificate of calibration must have these items:**
  - Model/Device Name or Number
  - Serial number
  - Date of calibration (report or issue date)
  - Measurement results indicate unit passed testing: This may be listed under “Pass/Fail,” “In Tolerance,” or “In Tol.”

**The certificate of calibration testing must be issued by an appropriate entity.** The certificate must indicate at least one of the following items below about calibration testing.
  - Conforms to ISO 17025
  - Testing was performed by an ILAC/MRS Signatory body accredited laboratory.
  - Is traceable to the standards maintained by NIST
  - Meets specifications and testing requirements for the American Society for Testing and Materials (ASTM) Standard E2877 tolerance Class F (0.5 °C) or better

CDC recommends certificates of calibration documents uncertainty within suitable limits of +/-1 F (+/- .5 C). The CDC recommends that certifications be issued for the entire monitoring unit (detachable probe, data logger, etc.) and not individual certificates for each component. The VFC program recommends back-up data loggers have a different date of calibration so that providers do not have all of their data logger certificates of calibration expiring at the same time. |
| **Temperature Monitoring** | Temperatures for each unit must be read and manually documented twice each workday, at least three days a week, at the beginning of the day and prior to closing. Additionally, the minimum and maximum temperatures should read and documented at the beginning of each workday and documented. Temperature logs are required to be maintained for three years. Temperatures should be recorded in I-CARE on a weekly basis. **By January 1, 2018, VFC providers must also read and document the minimum and maximum temperatures at the beginning of each workday.** |
| **Borrowing** | The VFC program does not allow the borrowing of VFC vaccine. **The VFC program cannot support a policy that permits borrowing of VFC vaccine for use in non-eligible children, which includes children with CHIP insurance coverage.** Providers may not borrow private vaccine and expect VFC to pay back their private stock, nor may providers borrow VFC vaccine to use in non-eligible children and then pay back VFC with private stock. |
**Vaccine Transfers & Returns**

Ordered vaccines must be shipped and stored at the facility indicated on the clinic profile on the enrollment forms and in I-CARE. VFC vaccines may be transferred in limited situations and only to other VFC-enrolled providers. Refer to the VFC Vaccine Transfer Approval memo for details and guidelines for vaccine transfers. The transfer approval memo, transfer approval request form, and transfer contact log are available in I-CARE on the home page under “Immunization Links.”

**Expired (Returned to McKesson) and Wasted (Not Returned to McKesson) Vaccines**

VFC providers must record all expired and wasted vaccine doses in I-CARE so that expired vaccines may be returned to the vaccine distributor for excise tax credit. Expired vaccines must be returned within six months of the expiration/spoilage date. Provider may not use the wasted (not returned to McKesson) transaction to balance their inventory. Providers reporting excessive expired or wasted vaccines may be responsible for replacing those vaccines according to the Vaccine Loss and Replacement Policy.

**Site Visits**

Actively enrolled VFC providers agree to VFC program site visits, which may include compliance visits, storage and handling visits, or educational site visits. Storage and handling visits serve as spot checks to ensure VFC supplied vaccines administered to VFC-eligible children are managed and stored according to program requirements. Any active VFC provider may be chosen to receive a storage and handling visit.

**Vaccine Management Plan**

All VFC providers are required to have a Vaccine Management Plan and to review it annually or more often if staff changes. The Vaccine Management Plan template is available in I-CARE on the home page under “Immunization Links.”

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**ENROLLMENT**

All VFC providers are required to submit an annual enrollment to continue in the VFC program. Annual enrollment must be submitted and approved by January 1st of the year or the provider will be terminated from the VFC program. Enrollment documentation is available in and submitted through I-CARE.

Providers will need to read and agree to the following policies, which are available in I-CARE and updated annually:

- VFC Enrollment Agreement Terms
- VFC Provider Enrollment Policy
- VFC Loss and Replacement Policy

Provider agreement forms must be signed annually by the medical director or the equivalent in a group practice. The health care provider signing the agreement must be a practitioner authorized to administer pediatric vaccines under state law. The practitioner will also be held accountable for compliance by the entire organization and its VFC providers with the responsible conditions outlined in the Provider Enrollment Agreement.

All licensed health care providers in the enrolled practice – and their corresponding professional license numbers - must be listed on the provider agreement form.

According to Section 1928 (c) (1) (A) of the Social Security Act (42 U.S.C. 1396s (c) (1) (A) the following providers qualify to be VFC program-registered providers:

Health care providers “licensed or otherwise authorized for administration of pediatric vaccines under the law of the State in which the administration occurs” (subject to section 333 (e) of the Public Health Service Act, which authorizes members of the Commissioned Corps to practice).
The CDC Provider Agreement form represents the provider’s agreement to comply with all the conditions of the VFC program, as well as ensuring that the practice/clinic/facility and all providers listed on the agreement will adhere to the requirements of the program.

Please refer to I-CARE for detailed instructions on the enrollment procedure.

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**VFC ENROLLMENT VISITS**

All providers newly enrolling or re-enrolling after an absence in the VFC program must have an enrollment site visit. The purpose of this visit is to ensure that providers and provider office staff are educated on the VFC program requirements and have appropriate resources to implement program requirements. The enrollment visit will include the following content:

- Review and confirm provider and staff understand and are able to implement the requirements of the VFC program as outlined on the VFC Provider Enrollment Policy.
- Review of all VFC requirements and confirmation of the provider’s understanding
- Confirmation that the provider knows who to contact if problems arise, specifically with storage and handling issues

A VFC storage and handling and/or compliance visit may be conducted approximately three to six months after the enrollment visit.

By the end of the enrollment visit, the provider and staff will understand:

- The eligibility requirements for the VFC program.
- The eligibility requirements for children who are state vaccine-eligible.
- Where to refer underinsured children for VFC vaccine if the child is not state-eligible in that practice (FQHC/RHC or other deputized provider).
- How and when to screen and document VFC eligibility appropriately.
- How to screen and document VFC eligibility in special populations.
- Children who have Medicaid Title XIX (19) as secondary insurance are VFC-eligible.
  - Providers will understand the options of administering VFC vaccine and billing Medicaid for the administration fee.
  - If the child’s primary insurance includes full immunization benefits and no out-of-pocket expense for the parent, the provider may opt to use private stock vaccine and bill the private/primary insurance for the cost of the vaccine and the administration fee.
  - The provider MUST NOT administer VFC vaccine and bill the private/primary insurance for the cost of the VFC vaccine and/or vaccine administration.

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**EDUCATION REQUIREMENT**

Each VFC vaccine coordinator is required to complete annual VFC education on vaccine storage and handling. Documentation of training must be retained and submitted with annual enrollment, as well as reviewed during site visits. Education is available through VFC compliance site visits, VFC educational visits, regional VFC trainings offered through the Department partners (ICAAP or EverThrive) or through CDC online training, “You Call The Shots – Module 10 – Storage and Handling,” available at [http://www2a.cdc.gov/nip/isd/ycts/mod1/courses/sh.ce.asp](http://www2a.cdc.gov/nip/isd/ycts/mod1/courses/sh.ce.asp). Additional online training will be available soon through the Illinois Chapter of American Academy of Pediatrics at [http://illinoisaap.org/](http://illinoisaap.org/).
A VFC Training Log is also available in the Vaccine Management Plan for providers to document training received. Copies of training certificates must be attached to the training log.

**MEMORANDUM OF UNDERSTANDING (MOU) WITH A FQHC OR RHC**

LHDs who wish to qualify to vaccinate underinsured children using VFC vaccine must be established and recognized as a FQHC, RHC or an agency with FQHC delegate authority. A FQHC or RHC must use the CDC’s memorandum of understanding (MOU) (request from the VFC program) to delegate authority to certified LHDs who are not an FQHC with a Health Resources and Services Administration PHS Section 330 grant award notice or an RHC with a Department RHC status letter and participate in the Illinois VFC program to vaccinate underinsured children on their behalf. Providers should retain a copy of their MOU and submit it annually during VFC re-enrollment to continue to be able to administer VFC vaccine to underinsured patients. LHDs are not required to complete a new MOU unless the Medical Director at the LHD has changed. Completed MOUs will be reviewed and updated as needed. For more information on deputization agreements, please contact the VFC program at DPH.Vaccines@illinois.gov.

**TERMINATION OF ENROLLMENT AGREEMENT**

IDPH or the provider may terminate this agreement at any time or if there is failure to comply with these requirements. If the agreement is terminated, the provider agrees to properly return any unused VFC vaccines within 30 days of the termination date. VFC vaccines may not be used after the unenrollment or termination date. The VFC program unenrollment form is available in I-CARE on the home page under “Immunization Links.”
4. **VACCINE MANAGEMENT**

Vaccine management is a broad term intended to describe the storage and handling practices that should be followed by all VFC providers. While the vaccine management practices here specifically only applies to VFC vaccines, we recommend providers consider the VFC vaccine management as a best practice for their private vaccine inventory as well.

The CDC Vaccine Storage and Handling Toolkit provides guidance and best practices for all health care providers (including VFC-enrolled providers) and is available at [http://www.cdc.gov/vaccines/recs/storage/toolkit/storage-handling-toolkit.pdf](http://www.cdc.gov/vaccines/recs/storage/toolkit/storage-handling-toolkit.pdf).

**VACCINE COLD CHAIN**

The vaccine cold chain is a system or process used to maintain vaccines at optimal conditions. Vaccines must be stored properly from the time they are manufactured until the time they are administered to ensure those who receive the vaccines are protected from disease. Excess heat or cold will reduce vaccine potency and increase the risk that recipients will not be protected. All VFC vaccine storage and handling requirements and recommendations are in place to ensure the cold chain is maintained.

**RECEIVING AND UNPACKING VACCINE SHIPMENTS**

Upon receipt of a vaccine shipment, providers must:

- Open vaccine packages immediately
- Check the temperature monitor readings
- Inspect the vaccine and packaging for damage
- Determine length of time the vaccine was in transit by looking at the packing list
- Compare the vaccine received with the vaccine products that appear on the packing list
- Immediately store at appropriate temperatures

All staff who accepts vaccine deliveries must be instructed on the importance of maintaining the “cold chain.” Vaccines must be stored properly from the time they are manufactured until the time they are administered. Excess heat or cold will reduce their potency and increase the risk that recipients will not be protected.

When the vaccine is received by front desk personnel, the vaccine coordinator or back-up vaccine coordinator must be notified immediately. The box should be taken to the storage area and unpacked in the following manner:

1. Open the shipping container immediately upon delivery and examine the contents for signs of physical damage, vaccine shipment shortages, and possible out of range temperatures.
2. **WITHIN TWO HOURS OF VACCINE DELIVERY:** If any damage, excessive shipping time, or cold chain breach has occurred or a delivery shortage is noted, the provider must IMMEDIATELY call the Department’s Immunization Promotion Center (IPC) at 217-786-7500.
   - If the provider does not call the Department within two (2) hours of the vaccine delivery to report discrepancies and/or cold chain issues, this constitutes provider negligence in accordance with the Vaccine Loss and Replacement Protocol due to handling and storage
mishaps by provider staff. Shipments that result in vaccine loss negatively impact the Illinois VFC vaccine budget.

- Providers should never refuse a shipment. Providers should receive the package and IMMEDIATELY report any concerns to the Department. Shipments refused at the provider site are not able to be returned and evaluated in a timeframe that is possible to save the vaccine. Providers will be responsible for replacing any vaccines wasted due to refusal to accept a shipment.

- When calling IDPH about a vaccine delivery: Expect that staff will have to report on temperature indicators if anything is wrong (cold chain breach indicated). A questionnaire will be completed with Illinois VFC program and CDC/manufacturer to determine viability. Provider staff should store the vaccine appropriately and maintain the shipment packing list. Ensure that temperature logs are maintained for the vaccine in question. IDPH, CDC, and/or McKesson Specialty MAY ask for this paper work.

3. With each vaccine delivery, check the actual vaccines received against the shipping invoice to verify all vaccines were received. Compare the original order against what was received. **If a discrepancy is found with the order, contact the Illinois VFC program within two (2) hours of delivery at 217-786-7500.**

4. Make sure diluents that accompany MMR, MMRV, and Varicella match the amount of vaccine received.

5. Place the new vaccines into the refrigerator and/or freezer immediately with the shortest expiration dates in the front of the pack. Vaccines should be kept in their original packaging with the lids in place until ready for administration and stacked in rows with vaccine of the same type.
   - Store refrigerated diluents with corresponding vaccine (these diluents may contain vaccine antigen).
   - Separate the VFC vaccines from other public and private supply by identifying the VFC vaccines and placing them in a separate labeled area of the refrigerator and/or freezer. See the following diagram on how to identify and store vaccines.
1. **How to identify vaccine by public funding type**

There are generally 4 types of public funding:
- VFC
- 317
- State
- CHIP

The funding type for each public vaccine is listed on the shipment’s packing slip. Your private vaccines come in a separate shipment and must be stored apart from public vaccines.

2. **How to store vaccine with only one fund type in a box**

Organize your storage unit so vaccines are separated by VFC, Other Public, and Private. You can either:

- Label the storage unit shelf.
- Label the bins.
- Place the vaccine in the proper bin.

OR
Shown below are photographs of Merck frozen shipping containers.

Frozen vaccines are shipped directly from Merck and will contain a shipper insert in the box to let the provider know how long the product is good for based on the shipment date shown on the packing list. Shown below are examples of the one, two, and four-day shipper inserts. With frozen vaccine shipments, the diluent is located in the lid compartment of the shipping box.

**DAY-TO-DAY VACCINE MANAGEMENT**

The following are recommended practices for providers handling vaccines:

- Separate the VFC vaccines from other public and private supply by identifying the VFC vaccines and placing them in a separate labeled area of the refrigerator and/or freezer.
- Store vaccines in their original packaging
- Store vaccines in the middle of the unit, with space between both the vaccines and the side/back of the unit.
- Do not store vaccines in the doors, vegetable bins, or floor of the unit, or under or near cooling vents.
- Do not store food or drink in vaccine storage units.
- Place water bottles throughout the refrigerator and frozen water bottles in the freezer storage units in order to:
  - Stabilize or extend temperatures during a power outage,
- Help to mitigate the effects of frequent open/closing door during busy clinic days, and
- Serve as physical blocks preventing the placement of vaccines in areas of the unit that are at higher risk for temperature excursions.

- **Rotate vaccines every week or when a new shipment comes in (whichever happens more frequently) so that newer vaccines are stored toward the back of the unit, while those soonest-to-expire are stored in the front and administered first.**
- Open only one vial or box of a particular vaccine at a time to control vaccine use and allow easier inventory control. On each opened vaccine vial, indicate on the label the date and time it was reconstituted or first opened.
- Store vaccine products that have similar packaging in different locations in the storage unit to avoid confusion and medication errors.
- Limit access to the vaccine supply to authorized personnel only.
- Install locks on refrigerators and, if possible, the electrical plug.
- Safeguard public vaccines by providing facility security, such as temperature alarms and restricted access to vaccine storage and handling areas.
- In larger clinics, provide a source of back-up power (generator) and a security system to alert appropriate personnel in the event of a power outage.
- If applicable, test back-up generators quarterly and maintain back-up generators at least annually (check manufacturer specifications for test procedures and maintenance schedules).
- In regular clinics/practices, vaccines should be prepared immediately prior to administration. CDC strongly recommends NOT pre-drawing doses before they are needed.

### BORROWING VACCINES

VFC-enrolled providers are expected to maintain adequate inventories of vaccine for their privately insured and VFC-eligible patients. VFC vaccine cannot be used as a replacement system for a provider’s privately-purchased vaccine inventory. The provider must ensure their VFC vaccine supply is adequate to meet the needs of the provider’s VFC-eligible patients.

The VFC program does not allow the borrowing of VFC vaccine. The VFC program cannot support a policy that permits borrowing of VFC vaccine for use in non-eligible children, including children with CHIP (Medicaid Title XXI [21] or State Funded). Private vaccine used on VFC patients cannot be paid back using VFC vaccine. Similarly, VFC vaccine cannot be used in non-eligible children and then paid back with private stock. If VFC vaccine is unavailable, the provider should refer the VFC eligible child to a local health department or FQHC or reschedule the child.

### EQUIPMENT TYPES

VFC providers receive vaccine at no cost to them. However, the vaccines they receive are purchased with millions of taxpayer dollars. To reduce waste and spoilage of expensive vaccines, the VFC program has guidelines for vaccine storage units.

Vaccine must be stored in one of the following equipment types:

- A. Pharmaceutical/medical grade refrigerator/freezer
- B. Stand-alone refrigerator (household or commercial)
- C. Stand-alone refrigerator (pharmaceutical/medical grade)
- D. Stand-alone freezer (household or commercial)
- E. Stand-alone freezer (pharmaceutical/medical grade)
Household combination refrigerator/freezers, dormitory or bar style units are not allowable for the storage of VFC vaccines.

CDC recommends the use of stand-alone refrigerator and freezer units, meaning a self-contained unit that only refrigerates or freezes and is suitable for vaccine storage. These units can vary in size, from a compact, under-the-counter style to a large, stand-alone, pharmaceutical grade storage unit. Additional information on CDC recommendations for vaccine storage can be located from the American Academy of Pediatrics at https://www.aap.org/en-us/Documents/immunization_vaccinestoragerf.pdf.

### ACCEPTABLE STORAGE UNITS

The following table lists the acceptable types of storage units as of January 1, 2017.

<table>
<thead>
<tr>
<th>Grade/Type</th>
<th>Description</th>
<th>Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pharmaceutical grade/purpose-built units (stand-alone)</td>
<td>Specifically engineered to maintain consistent temperatures throughout the unit. Purpose-built or pharmacy-grade refrigerators can be compact, making them ideal for small offices.</td>
<td>Best</td>
</tr>
<tr>
<td>Pharmaceutical grade/purpose-built units (combination)</td>
<td>Pharmaceutical grade and purpose-built units are specifically engineered to maintain consistent temperatures throughout the unit. These units have more than one compressor allowing for better and separate temperature control of the refrigerator and freezer compartments. <strong>Household combination units are NOT acceptable.</strong> Manufacturers and distributors of pharmaceutical/medical grade/purpose-built units may include Aegis, American Biotech Supply, Compact Appliance, Fisher Scientific, Follett, Helmer, Lab Research Products, Living Direct, Migali Scientific Refrigeration, Sanyo Biomedical, Sun Frost, Thermo Scientific, and others. Storage units often found at discount retail stores or big box retailers are probably <strong>not</strong> pharmaceutical/medical grade/purpose-built units.</td>
<td>Best</td>
</tr>
<tr>
<td>Commercial units* (stand-alone)</td>
<td>Usually intended to store food and beverages and are often larger and more powerful than household units. These units are not specifically designed to store biological materials.</td>
<td>Good</td>
</tr>
<tr>
<td>Household* (stand-alone)</td>
<td>Usually smaller than commercial units and are intended for use in small offices and in homes, typically for food storage. Like commercial units, they are not designed to store biological materials.</td>
<td>OK</td>
</tr>
</tbody>
</table>

*These units may require additional water bottles (refrigerator) or frozen water bottles (freezer) to maintain stable temperatures. Consult your VFC Representative for guidance.

In addition, frost-free or automatic defrost cycle units are preferred. Because freezing of refrigerated vaccines affects vaccine potency more than other exposure problems, it is especially important that refrigerators be selected and set up to minimize the chance of freezing vaccine. Providers should aim for maintaining refrigerator temperatures at 40 F or 5 C.
A separate stand-alone freezer should then be used to store frozen vaccines, since studies conducted by the National Institute for Standards and Technology (NIST) have demonstrated that the freezer section of combination units is not capable of reliably maintaining appropriate frozen vaccine storage temperatures.

**Dormitory-style or bar-style refrigerators are not allowable to store VFC vaccine at any time, even for temporary storage.** Dormitory-style refrigerators do not maintain proper temperatures and pose a high risk of freezing vaccine. Any VFC vaccines found to be in dormitory-style refrigerators will be wasted and providers will be expected to replace the wasted VFC vaccine with privately-purchased vaccine. See the CDC Storage and Handling Toolkit at [http://www.cdc.gov/vaccines/recs/storage/toolkit/storage-handling-toolkit.pdf](http://www.cdc.gov/vaccines/recs/storage/toolkit/storage-handling-toolkit.pdf) for additional information.

CDC does not recommend storage of any vaccine in a dormitory-style combined refrigerator/freezer unit or bar-style unit under any circumstances. A dormitory-style refrigerator is defined as a combination refrigerator/freezer unit that is outfitted with one exterior door and an evaporator plate (cooling coil), which is usually located inside an icemaker compartment (freezer) within the refrigerator. Some dormitory-style units may be sold as medical grade units, but may still be classified as dormitory-style due to having one exterior door with a freezer compartment located inside the refrigerator section. Any refrigerator having one exterior door with a freezer compartment located inside the refrigerator is considered as a dorm-style refrigerator, regardless if the unit is small to sit on top of a counter or the size of a standalone refrigerator.

Bar-style units are designed to only store beverages. Temperatures in these types of units are very unstable and difficult to maintain an average temperature of 40 F. Every time the door of a bar-style refrigerator is opened, a high percentage of the cold air in the unit is lost, which causes large fluctuations in the temperatures.

The 2009 NIST research concluded that “the dorm-style refrigerator is NOT recommended for vaccine storage under any circumstance.” In performance testing, the dormitory-style refrigerator demonstrated consistently unacceptable performance, regardless of where the vaccine was placed inside the unit. This type of unit exhibited severe temperature control and stability issues. Large spatial temperature gradients confirmed there is no “good” vaccine storage area in this style unit. Dormitory-style (or bar-style) units pose a significant risk of freezing vaccine even when used for temporary storage. Note that the use of dormitory-style units for storage of VFC vaccines or other vaccines purchased with public funds is prohibited.

Compact, purpose-built storage units are available for vaccine storage that are not considered to be dormitory-style or bar-style.
The following examples are considered dormitory-style or bar-style units and are NOT allowable to store VFC vaccines at any time.
These refrigerators are the size of a household refrigerator, but they are still classified as a dorm-style refrigerator because they have the one exterior refrigerator door with the freezer compartment located within the refrigerator sections. These are not allowable storage units for vaccine storage.

Any refrigerator or freezer unit used for vaccine storage must be able to maintain vaccine storage temperatures year-round, be large enough to hold the year’s largest inventory, be dedicated only to the storage of vaccines, and must have a certified calibrated data logger inside each compartment used for storing vaccine.

VFC providers receive vaccine at no cost to them. However, the vaccines received are purchased with millions of taxpayer dollars. To reduce waste and spoilage of expensive vaccines, the VFC program has guidelines for vaccine storage units.

<table>
<thead>
<tr>
<th>Office Size</th>
<th>Recommended Equipment Size</th>
</tr>
</thead>
<tbody>
<tr>
<td>Very High Volume</td>
<td>Pharmacy-grade or biologic-grade refrigerator-only units and stand-alone freezer units</td>
</tr>
<tr>
<td>10,000 doses/year</td>
<td></td>
</tr>
<tr>
<td>High Volume</td>
<td>Refrigerator-only (16.7 cubic feet minimum) and stand-alone freezer units</td>
</tr>
<tr>
<td>2,000-10,000 doses/year</td>
<td></td>
</tr>
<tr>
<td>Medium Volume</td>
<td>Refrigerator-only (16.7 cubic feet minimum) and stand-alone freezer units</td>
</tr>
<tr>
<td>500-2,000 doses/year</td>
<td></td>
</tr>
<tr>
<td>Low Volume</td>
<td>OR</td>
</tr>
<tr>
<td>Less than 500 doses/year</td>
<td>Pharmacy-grade or biologic-grade under the counter units</td>
</tr>
</tbody>
</table>
TEMPERATURE MONITORING

CDC recommends storing refrigerated vaccines must be maintained between 2 C and 8 C (36 F and 46 F) and frozen vaccines between -50 C and -15 C (-58 F and 5 F) at all times.

Vaccine manufacturers set vaccine temperature requirements for storage. It is important to follow manufacturer vaccine product specifications found in the package insert. The package insert describes the required storage conditions for a particular vaccine.

Manufacturers have access to internal (unpublished) thermostability data concerning the impact of exposures to inappropriate temperatures or light for each vaccine lot. Any time the vaccines are exposed to temperatures outside the required ranges, providers must complete a Vaccine Incident Report (available in I-CARE on the home page under “Immunization Links”) and contact the vaccine manufacturers to determine vaccine viability.
TEMPERATURE MONITORING AND EQUIPMENT

The recommended method to ensure a refrigerator or freezer is maintaining the proper temperature for vaccine storage is to check and record the temperature at least twice a day each workday, preferably at the start and end of the workday, and no fewer than three times a week.

Check and record storage unit temperature readings twice each workday—in the morning when you arrive and in the evening before leaving. This should be done even if there is a digital data logger monitoring device. A temperature monitoring log sheet should be placed on each storage unit door (or nearby), and the following information should be recorded:

- Temperature: current, minimum and maximum temperatures
- Date
- Time
- Initials of person recording the data

The twice-daily checks provide an opportunity to inspect the storage unit, reorganize any misplaced vaccines, and remove any expired vaccines. The minimum and maximum temperature should also be reviewed and noted. VFC providers will be required to enter the minimum and maximum temperatures in I-CARE no later than January 1, 2018.

The provider must adhere to the following guidance:

- Each refrigerator and freezer must have a calibrated working data logger certified in accordance with the National Institute of Standards and Technology (NIST) or a laboratory recognized by NIST, placed in a central area inside each compartment used for storing vaccine.
- VFC providers are required to have at least one back up data logger with a current certificate of calibration on hand (not stored in unit alongside current data logger). It should be available in case the data logger in use is no longer working appropriately or calibration testing of the current equipment is required.
- Calibration testing of data loggers must be performed at least every two years from the last calibration testing date (date certificate issued).
- Manually check and document temperatures on temperature logs.
- Handwritten temperature logs and I-CARE temperature logs must have the time of the reading and initials of the provider staff recording the temperatures.
- Record temperatures in I-CARE at minimum weekly.
- Record data logger calibration information in I-CARE, including the date calibration certification is due.
- Download and review data logger data files on a weekly basis.

* All VFC program related documentation, including eligibility screening, vaccine temperature log reports, and vaccine order documentation, must be retained for three years.

All VFC providers must have certified calibrated digital data loggers for continuous temperature monitoring for each VFC storage unit and back-up temperature monitoring.

CDC recommends use of a continuously monitoring and recording digital data logger with downloadable capabilities and the characteristics listed below.
Digital data logger should have a detachable probe in a buffered material (e.g., glycol) with continuous monitoring capabilities. The temperature should be easily readable from the outside of the unit. Additional recommended features include:

- A detachable probe in a buffered material (e.g., glycol, glass beads, sand, Teflon®);
- Current, minimum and maximum temperatures indictor easily readable from the outside of the unit;
- Alarm for out-of-range temperatures;
- Low battery indicator*;
- Recommended uncertainty of +/- 0.5°C (1°F) accuracy;
- Equipped with user programmable logging interval (or reading rate) of 15 minutes or less.

*Since these devices are typically battery-operated, have a supply of extra batteries on hand. Battery changes may affect temperature accuracy and may warrant checking against a known calibrated temperature device. Check with the device’s manufacturer for specific information on battery changes.

Because a major risk factor affecting potency of refrigerated vaccines is exposure to freezing temperatures, it is important and recommended that glycol-encased probes are placed in the same area where the vaccine is stored. Vaccine and temperature monitors should be located in the central area of the storage unit where appropriate temperatures are best maintained.

Providers are responsible for maintaining current Certificates of Traceability and Calibration Testing.¹ Calibration testing of data loggers must be performed at least every two years from the last calibration testing date (date certificate issued). Provider must keep the certificate of calibration for each data logger and back-up data logger, and make them available during site visits and for the annual enrollment.

A Certificate of Traceability and Calibration Testing (also known as a Report of Calibration) must include key pieces of information. Information required on the certificate depends on whether the laboratory performing calibration testing is an accredited or non-accredited laboratory. Before sending your data logger(s) for calibration, check with the calibration company to verify required information will be included on your certificate. Many companies will provide a sample certificate of calibration upon request.

The following checklist describes the items required to be on the certificate of calibration.

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**CHECKLIST FOR CERTIFICATE OF CALIBRATION REPORTS**

The certificate of calibration must have these items:

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¹ Certificate of Traceability and Calibration Testing (also known as Report of Calibration) is a certificate that informs the user of a data logger’s level of accuracy compared to a recognized standard based on testing by the National Institute of Standards and Technology (NIST).
• Model/Device Name or Number
• Serial number
• Date of calibration (report or issue date)
• Measurement results indicate unit passed testing: This may be listed under “Pass/Fail,” “In Tolerance,” or “In Tol.”

The certificate of calibration testing must be issued by an appropriate entity. The certificate must indicate at least one of the following items below about calibration testing.

• Conforms to ISO 17025
• Testing was performed by an ILAC/MRS Signatory body accredited laboratory.
• Is traceable to the standards maintained by NIST
• Meets specifications and testing requirements for the American Society for Testing and Materials (ASTM) Standard E2877 tolerance Class F (0.5 °C) or better

If your certificate(s) of calibration does not have all of the required items, contact the manufacturer of the data logger (or whoever did the calibration testing) to see if they will reissue the certificates. Several manufacturers have indicated they are willing to reissue certificates to include the missing items.

If you need to purchase new data logger, please contact the company and ask them to provide you with a sample of their certificate of calibration so you can see if all of the required items are listed before you purchase the data logger. If you would like for IDPH to review a sample certificate of calibration, please email it to DPH.Vaccines@illinois.gov. Please be sure to include your VFC PIN on all communication.

If your certificate of calibration does not have an expiration date specified, the VFC program will allow an expiration date of no longer than two years from the date calibration testing was performed.
The diagrams below show the VFC vaccine refrigerator setup.

1. Remove all drawers and bins. Vaccines should not be stored in refrigerator doors, drawers, or bins.

2. Put a few water bottles in areas where vaccines will not be stored.

3. Use a calibrated thermometer to ensure accurate temperatures. The thermometer must have a glycol-encased probe. The digital monitor must display CURRENT, MIN, and MAX temperatures. Place the probe in the center of the refrigerator, near the vaccines.

4. Attach the monitor to the outside of the refrigerator, either on the door or on the side.


6. Set the refrigerator temperature. If the refrigerator has a thermostat, set it for 40°F. If it has a dial with a range of numbers, set it to slightly warmer than the middle of its range. The next morning, check the temperature and adjust it until it stabilizes at approximately 40°F.

7. Once the temperature has stabilized, record it on the temperature log. Record CURRENT, MIN, and MAX temperatures twice a day. Do not store vaccines in the refrigerator until the temperature is stable at around 40°F for 3-5 days.
If you have vaccines that will expire in 6 months or less that you will not be able to use, notify the VFC program.

36F and 46F

Below 36F is too cold!
Call VFC.
The diagrams below show the VFC vaccine freezer setup.

1. Put a few cold packs in areas where vaccines cannot be stored, like the door and the top shelf.

2. Use a calibrated thermometer to ensure accurate temperatures. The thermometer must have a glycol-encased probe. Place the probe in the center of the freezer, near the vaccines.

3. Temperature monitors must display CURRENT, MIN, and MAX temperatures. Attach the display of the primary thermometer to the outside of the freezer.


5. Set the freezer temperature. If the freezer has a thermostat, set it at -5°F or below. If it has a dial with a range of numbers, set it in the middle. The next morning, check the temperature and adjust it until it stabilizes below 0°F.

6. Once the temperature has stabilized, start recording temperatures on the temperature log twice a day. Do not store vaccines in the freezer until the temperature stays below 0°F for 3–5 days.
Freezers with automatic defrost may produce temperature excursions when going through defrost cycles. Any time a vaccine storage unit has temperature excursions, a vaccine incident report must be completed to follow up on the out of range temperatures, including temperature excursions from defrost cycles. Merck has stated providers should contact them each time they have a temperature excursion with frozen vaccines – even when it is due to defrost cycles. Merck explained the stability information they provide is based upon the specific set of conditions the provider reports and should not be applied generally across the board.

If you have vaccines that will expire in 6 months or less that you will not be able to use, notify the VFC program.
The CDC Storage and Handling Toolkit provides storage best practices that may help prevent temperature excursions in freezers with the automatic defrost cycles:

- The vaccines and the data logger probe should be placed in the center of unit, 2 to 3 inches away from walls, ceiling, floor, and door to allow the cold air to circulate. A data logger probe placed near the walls, floor, vent, ceiling, or door may indicate temperatures that are warmer than the actual vaccine temperature.
- Frozen water bottles in the unit will help stabilize or extend temperatures in the freezer. Place frozen water bottles against the walls, in the back, on the floor, and in the door racks. Putting frozen water bottles in the unit can help maintain stable temperatures caused by frequently opening and closing unit doors, power failures, or even the automatic defrost cycles. It can also prevent vaccines from being stored in areas where there is a greater risk of out-of-range temperatures (such as the floor and door).

For manual defrost freezers: While manually defrosting the freezer, providers should move their frozen vaccines to another freezer that is being monitoring and temperatures documented. This second freezer cannot be a household/commercial “combination” unit; it must be a stand-alone freezer. When the original freezer is once again maintaining stable temperatures, the vaccines can be returned to the original unit.

**VACCINE MANAGEMENT PLAN**

All VFC providers must have a vaccine management plan on file that is reviewed and updated at least annually or more often when staff changes occur.

The Department has created a vaccine management plan template, which is available in I-CARE on the home page under “Immunization Links.” The vaccine management plan template is a guideline for the protection and maintenance of the office’s vaccine supply. The responsibilities listed in the vaccine management plan are those of the primary and back-up vaccine coordinators.

A copy of the Vaccine Storage and Emergency Response Plan must be posted on all refrigerators/freezers used to store VFC vaccines.

Office staff that handle or administer vaccines should be familiar with the vaccine management plan, which includes the vaccine storage and emergency response plan, and ensuring vaccines are maintained within the required temperature range.

The VFC program recommends that providers use the vaccine management plan template developed by the Department as it covers all required elements. Providers are able to create their own vaccine management plan, but it must include the following items.

- Name of the current primary vaccine coordinator and at least one back-up coordinator
- Signature, name, and title of the person completing the plan
- Date the plan was completed
- Contact information for individuals with 24-hour access to the building
- General operations for the following vaccine storage and handling practices:
  - Proper vaccine storage and handling practices
  - Temperature monitoring
Vaccine storage (e.g., equipment, placement)
Vaccine shipping and receiving procedures
Vaccine ordering procedures
Inventory control (e.g., stock rotation)
Vaccine expiration, spoilage, and wastage prevention (e.g., protocol for responding to and reporting vaccine loss)
Protocols for vaccine storage equipment maintenance
Protocols for the correct placement of vaccines within storage units
Protocols for responding to vaccine storage and handling problems

- Staffing
  - Descriptions of the roles and responsibilities of the primary and alternate (back-up) vaccine coordinators
  - Policy on education and training for facility staff
  - Staff training and documentation of training on VFC requirements, including proper vaccine storage and handling

- Emergency response plan:
  - The emergency response plan must include guidance on what to do in the event of refrigerator or freezer malfunctions, power failure to vaccine storage units, natural disasters, or other emergencies that might compromise appropriate vaccine storage conditions.
  - Contact information for emergency storage locations.
  - Contact information for refrigerator and freezer maintenance and repair companies.
  - Contact information for vaccine storage unit alarm company (if applicable).
  - Sources for packing materials, calibrated temperature monitoring devices, and portable refrigerator/freezer units or qualified containers.
  - In addition, the plan must include policies and protocols for maintaining the vaccine cold chain during transport to and while stored in emergency storage locations.

TEMPORARY OFF-SITE VACCINE CLINICS

All temporary off-site clinics should be led by the local health department (LHD) VFC provider or a deputized LHD VFC provider. LHD VFC staff request IDPH VFC program approval for the requested clinic. Non-health department VFC providers or other outside organizations should request assistance from or collaborate with their LHD or a deputized LHD to lead temporary off-site clinics within their jurisdiction. This collaborative approach may improve access and immunization coverage for VFC eligible children.

All requests for a temporary off-site clinic must be submitted to the IDPH Immunization Program at least 30 days BEFORE the proposed scheduled clinic to receive IDPH approval.

Current VFC policy specifies that VFC vaccines are to be delivered directly to VFC clinic location on file in the current enrollment. The VFC program and CDC does not recommend routine transport of vaccine due to the risk to the cold chain and vaccine viability. However, because most temporary mass clinics typically require vaccine transport on the day of the clinic, the VFC program and CDC has determined that these temporary off-site clinics (e.g., school located clinic) require enhanced storage and handling practices.
SPECIFIC VFC PROGRAM REQUIREMENTS

All providers administering federal vaccines must meet all program requirements including, but not limited to:

- Eligibility screening and documentation;
- Proper vaccine administration fee billing;
- Receiving an assessment of where vaccines are stored prior to scheduled clinics and how vaccines are stored, handled, and administered on site; and
- A completed and approved provider enrollment agreement signed by the medical director of the clinic and by all parties involved with administering the vaccine.
- The responsibilities of each party involved must be detailed in writing.

VACCINE MANAGEMENT

To ensure vaccine is managed properly before, during and after a temporary off-site clinic, the following storage and handling practices are required:

1. Vaccine must be ordered and shipped directly from CDC to the VFC clinic location on file in the current enrollment.
2. All requests for a temporary off-site clinic must be submitted by the LHD for IDPH approval at least 30 days BEFORE the scheduled clinic.
3. The vaccine may be transported, not shipped, to the local schools or other community sites where the temporary clinics will be held. **Vaccines must be transported in only approved transport containers.** **Frozen vaccines must be transported in a portable freezer unit that maintains the temperature between \(-58^\circ\text{F}\) and \(+5^\circ\text{F}\) \((-50^\circ\text{C}\) and \(-15^\circ\text{C}\)).**
4. Only amounts of vaccines that are appropriate, based on VFC need, should be transported to each scheduled clinic.
5. Vaccine must be transported to and from the scheduled clinic at appropriate temperatures and must be monitored by a continuous monitoring and recording device with a probe in buffered material (e.g. digital data logger). **Temperatures during transport must be documented.**
6. The LHD must ensure the temporary off-site clinic vaccine storage meets VFC program requirements in order to maintain appropriate temperatures throughout the clinic day.
7. **On the day of the clinic:**
   a. All VFC vaccines must be stored in VFC compliant units.
   b. A continuous monitoring and recording device (data logger) with a digital display and probe in buffered material must be used.
   c. Temperatures in the refrigerator(s) and standalone freezer(s) storing VFC vaccines must be reviewed and documented every hour on the attached temperature log.
   d. Vaccines exposed to temperature excursions must be labeled “do not use” until further information can be gathered from the manufacturer(s) and verified by IDPH on the usability of the vaccine.
8. **At the end of the temporary off-site clinic:**
   a. The vaccines must be transported back to the VFC provider’s permanent location in the approved transport method.
   b. Store the vaccines under proper conditions as quickly as possible. Mark the boxes with a clear “DO NOT USE” sign until temperature storage has been evaluated by the LHD.
   c. Provide the handwritten temperature log(s) and data logger data file to the LHD to verify the vaccines were stored properly and can be administered.
d. Vaccines exposed to temperature excursions must be labeled “do not use,” but stored under proper conditions as quickly as possible until further information can be gathered from the manufacturer(s) and the Vaccine Incident Report has been reviewed and approved by the IDPH Temperature Excursion Team.

THE LHD’S ROLE

1. All temporary off-site clinics should be overseen and request submitted by the LHD VFC provider or a deputized LHD. If a preview site visit to check the off-site facility vaccine storage units and the transportation storage units is not possible, the LHD may request electronically submitted pictures or video prior to submitting the temporary off-site clinic request to IDPH.

2. All providers administering federal vaccine must meet ALL program requirements.

3. Complete and submit all of the paperwork 30 days in advance of the temporary off-site clinic.

4. Ensure the vaccines will be appropriately transported and temporary off-site storage meets VFC requirements.

5. Ensure digital data loggers will be used and vaccines storage temperatures will be monitored, manually reviewed, and documented hourly.

6. Evaluate and verify the vaccine data logs and temperature logs document the vaccines were transported and stored within appropriate temperature ranges before the vaccines may be returned to regular stock.

The VFC temporary vaccine clinic request for approval form is located in I-CARE on the home page under “Immunization Links.”
5. VACCINE LOSS AND REPLACEMENT

Vaccine accountability is a cornerstone of the Vaccines for Children (VFC) program and one of the program’s highest priorities. Vaccine losses are absorbed directly by the VFC program’s budget. Since the Illinois Department of Public Health (IDPH) VFC program is so important to the health and well-being of the children in Illinois, it is essential that all of us work together to ensure that every dose of vaccine is used to provide protection against preventable diseases. As a provider responsible for VFC program vaccines, you and your staff should continually monitor vaccine storage and handling practices. Notify the IDPH VFC program if you or your staff would like to receive an educational visit regarding vaccine storage and handling.

This document serves as the IDPH VFC program’s policy for management of incidents that result in loss of state-supplied vaccine, including VFC, 317, or other state purchased vaccine (hereafter referred to as “VFC program vaccine”). VFC providers are required to report all wasted, expired, spoiled or lost vaccine to the Illinois VFC program.

The VFC program does not allow the borrowing of VFC program vaccine. The VFC program cannot support a policy that permits borrowing of VFC program vaccine for use in non-eligible children. Providers are not able to borrow private vaccine and expect VFC to pay back their private stock, nor may providers borrow VFC program vaccine to use in non-eligible children and then pay back VFC with private stock.

Dose-for-dose replacement with privately purchased vaccine for VFC program vaccine may be required and provider’s ordering privileges may be suspended until replacement is made. Providers having excessive or habitual waste in the previous 12 months may also receive a storage and handling visit. Excessive waste is defined as wasted vaccine amounts that either exceeds $1,500 in value or three (3) percent of the total amount of vaccines received in the previous 12 months.

DEFINITIONS

Wasted: Any vaccine that cannot be used. This includes expired, spoiled and lost vaccines.
Expired: Any vaccine with an expiration date that has passed.
Spoiled: Any vaccine that exceeds the limits of the approved cold chain procedures or is pre-drawn and not used within acceptable time frames. Always consult with the vaccine manufacturer and Illinois VFC program before determining that the vaccine is spoiled or non-viable.
Lost: Commercial carrier (FedEx or UPS) or United State Postal Service (USPS) does not deliver the vaccine or does not deliver in a timely manner. This includes VFC vaccines the provider cannot locate, account for, thrown away, or disposed of against VFC policies.

SITUATIONS REQUIRING VACCINE REPLACEMENT

Below is a list of situations that require dose-for-dose replacement with privately-purchased vaccines.
EXPIRED VACCINE

- Failure to rotate or attempt to transfer vaccine that results in expired vaccine. VFC providers should document transfer attempts on the “VFC Vaccine Transfer Contact Log” (available in I-CARE on the home page under the Immunization Links tab).
- Provider orders of vaccines that exceed the provider profile on file which results in excessive expired inventory.

SPOILED VACCINE

- Pre-drawn vaccine that is not used. The Illinois VFC program strongly discourages the practice of pre-drawing vaccine.
- Handling and storage mishaps by provider staff.
- Vaccine that is left out of the refrigerator or freezer and becomes non-viable. Call the vaccine manufacturer first to help you determine the stability/viability of vaccine left out of the refrigerator/freezer and complete the VFC Vaccine Incident Report.
- Vaccine stored in dorm style refrigerators.
- Vaccine stored in a household combination refrigerator/freezer unit.
- Freezing vaccine that is supposed to be refrigerated.
- Refrigerating vaccine that is supposed to be frozen.
- Refrigerator/freezer left unplugged.
- Refrigerator/freezer door left open or ajar.
- Refrigerator/freezer equipment problems where proof of repair or equipment replacement is not provided to the Illinois VFC program within 30 days from the date you became aware of the situation.
- Power outages in which the provider fails to follow the facility’s Vaccine Storage and Emergency Response Plan.
- Vaccine that is considered spoiled due to the provider not checking, reviewing, and documenting refrigerator and freezer temperatures twice daily for a minimum of four days a week.
- Vaccine that is considered spoiled due to the provider failing to use currently certified calibrated data loggers (as primary and back-up data loggers) in each VFC storage unit to check temperatures twice daily.
- Vaccine that is spoiled and must be wasted because a provider did not take immediate or appropriate action on out-of-range temperatures to prevent vaccine from becoming spoiled.
- Provider not available to receive a delivery of vaccines during provider’s posted hours on file with the order and vaccine was exposed to temperature excursions during return to McKesson.
- Replacement vaccine: health care providers who must re-vaccinate due to negligence in failure to keep vaccine viable (temperatures out of acceptable range) or improper administration will be responsible for replacement of the vaccine needed to re-vaccinate.
- Depending on the outcome of any suspected fraud investigation by Centers for Medicare and Medicaid Services (CMS), Medicaid Integrity Group (MIG) Field Office and/or the appropriate state Medicaid agency, providers may be required to, among other things, return all VFC program vaccine, reimburse the state for the cost of used vaccines, and/or potentially be terminated from the VFC program. The Department of Public Health reserves any and all rights with respect to any future action.
WASTED VACCINE

• VFC program vaccines given to children or adults who are not eligible to receive it based on the most recent VFC eligibility criteria and Illinois immunization guidelines.
• VFC program vaccines administered to children or adults with the State’s Children Health Insurance Program (CHIP) coverage (Medicaid Title XXI [21] or State Funded).
• Discarding vaccine before the manufacturer’s expiration date (includes multi-dose vials discarded after 30 days).

LOST VACCINES

• VFC vaccines the provider cannot locate, account for, may have been thrown away, or disposed of against VFC policies.

OTHER

• Failure to call the VFC program within two (2) hours of receiving a VFC delivery when the delivered vaccines do not match the packing list or I-CARE inventory.
• Failure to call the VFC program within two (2) hours to report damaged or compromised VFC vaccine delivery.
• Transferring or transporting VFC vaccines, either refrigerated or frozen vaccines, to another VFC provider without IDPH pre-approval.
• Transferring or transporting varicella-containing vaccines to another VFC provider without IDPH approval on the transportation unit.

SITUATIONS NOT REQUIRING VACCINE REPLACEMENT

Below is a list of situations that are NOT considered “provider negligence.” This list is not exhaustive. In these situations, the provider is deemed not to be at fault. You may be required to produce a letter from the alarm/alert company or the power company.

• A commercial carrier or USPS does not deliver to the provider in a timely manner and the provider was available to receive the vaccine during provider’s posted hours. Before making the determination that the vaccine is non-viable, first call the vaccine manufacturer.
• A provider who has a contract with an alert/alarm company has a refrigerator that malfunctions, and the alarm/alert company does not notify the provider.
• A provider moves vaccine to a nearby hospital due to anticipated inclement weather, the hospital experiences a power failure, and the Illinois VFC program later deems the vaccine not viable.
• Power was interrupted or discontinued due to a storm, provider is able to confirm that the facility’s Vaccine Storage and Emergency Response Plan was followed and after consultation with the vaccine manufacturer(s) and the Illinois VFC program, it is determined that vaccine is not viable.
• A vial that is accidentally dropped or broken by a provider.
• Vaccine that is drawn after physician orders and parental agreement during the visit, but not administered due to parental refusal or a change in physician orders.
• Expired vaccine that is not due to provider negligence (including seasonal influenza vaccine).
• Extraordinary situations not listed above which are deemed by Illinois VFC program to be beyond the provider’s control.
• Refrigerator/freezer equipment problems where proof of repair or equipment replacement is provided to the Illinois VFC program within 30 days from the date you became aware of the situation.

**PROCEDURES FOR VACCINE REPLACEMENT**

This updated policy applies to any VFC vaccine documented as wasted.

• The provider will receive a notice from the Illinois VFC program or will be instructed via I-CARE that replacement of VFC vaccines with privately purchased vaccines is required.
• If proof of replacement is required, acceptable proof is packing list or paid invoice showing type, amount, lot number and expiration date of privately purchased vaccine that will then be marked and used as VFC vaccine.
• The provider must enter the privately purchased vaccine in I-CARE and record it as payback to VFC. Guidance will be provided on how to enter the transactions in I-CARE.
• Replacement of the vaccine is due within 30 days of receiving the Illinois VFC program notice.
• The Illinois VFC program will not supply vaccine to the negligent provider until restitution has been made. Enrollment or re-enrollment in the VFC program will not be accepted until full restitution is made.
• If vaccine replacement is required, the VFC provider will be notified by the IDPH VFC program staff.

**PROCEDURE TO APPEAL A VACCINE REPLACEMENT**

Providers may appeal the decision for replacement of wasted VFC vaccines by submitting the request in writing either via e-mail or fax.

Illinois Department of Public Health

[DPH.VFCTemps@illinois.gov](mailto:DPH.VFCTemps@illinois.gov)
Fax: 217-786-7506 to the attention of VFC Temps

Providers must include all documentation, including the vaccine incident report, any communication, and any other documentation supporting an appeal. Providers must include their VFC PIN on all communication.

Possible outcomes of an appeal may include the following.

1. A partial reduction in the amount of the required vaccine replacement.
2. Granting a substitution in the vaccine replacement (e.g. a multi-vaccine in place of a single component vaccine).
3. Extension up to 90 days for vaccine replacement.
4. Waive vaccine replacement. Factors to be considered include:
   a. Prior history of vaccine incidents and/or vaccine waste;
   b. Provider actions to prevent vaccine incidents from occurring again;
   c. Actions at the time of incident;
   d. Documentation of provider actions to transfer vaccines to other providers;
   e. Change in management, medical director, and providers within clinic; or
f. Extenuating circumstances.

5. If the provider is unable to use the replacement vaccines, the replacement vaccines may be shipped to a local health department or other approved provider.

All appeal requests will be reviewed and the provider notified of all decisions within 30 days.
6. ACCOUNTABILITY

VFC VACCINE ORDERS

Providers should order vaccine in accordance with actual vaccine need for one month and avoid stockpiling or build-up of more than a three-month supply. **Providers should maintain enough vaccine inventory to last one month; however, inventory should never exceed three months.** Orders may take two to three weeks from submission of order to vaccine delivery.

CDC recommends smaller, more frequent orders rather than large orders to minimize the amount of vaccine loss if an incident occurs during shipment or in the vaccine storage unit.

All vaccine orders are submitted through I-CARE. Providers must enter the following information to submit an order in I-CARE:

- Patient immunization records showing how each dose of VFC vaccine was administered.
- Temperature logs for all storage units being used to store state-supplied vaccine.
- All temperature excursions must have a vaccine incident report on file.
- Vaccine inventory and accountability for all state supplied vaccine must be up-to-date.
- Clinic must be open at least three days a week with at least four hours a day to be able to receive a delivery. Delivery hours must be entered and updated in I-CARE, including specifying if the clinic is closed during lunch or other hours, when placing orders through I-CARE.

Please consider your clinic’s delivery hours for the next two to three weeks and ensure a VFC vaccine coordinator on site to accept the delivery before placing an order.

The “Status Comment” field in the I-CARE order form should **not** be used to convey any of the following:

- Open/closed days
- Open/closed hours
- Critical delivery information

All Illinois VFC providers must provide individual patient immunization records on how each VFC vaccine was administered. The individual patient immunization records can either be directly entered into I-CARE or can be electronically transmitted to I-CARE from the provider’s electronic medical record (EMR) system. VFC providers not in compliance will not be able to continue participating in the VFC program.

Providers interested in setting up their EMR to transmit data to I-CARE should contact the I-CARE team at [DPH.HL7ICARE@Illinois.gov](mailto:DPH.HL7ICARE@Illinois.gov).

Providers must also notify the Department when there has been a change in the VFC coordinator or storage units either by calling 217-786-7500 or sending an e-mail to [dph.vaccines@illinois.gov](mailto:dph.vaccines@illinois.gov).

Providers may also use the “Contact Us” button in I-CARE and select “VFC Illinois” under the category for additional assistance.
PROVIDER PATIENT POPULATION PROFILES

Provider patient population profiles will be used by the Department staff to monitor provider orders. The patient population profile will be automatically populated in I-CARE based on the patient immunization records entered by the clinic in I-CARE or has transmitted from the provider’s EMR. Providers ordering more vaccine than should be needed for their VFC population will be contacted. If orders for excessive amounts of vaccine are placed on a regular basis, the provider will be contacted. The provider may be required to replace wasted vaccines due to excessive ordering. The issue also will be forwarded to the VFC administrator for follow-up.

VACCINE PRODUCTS WITH MULTIPLE NDCs

An important issue regarding any vaccine product with multiple national drug codes (NDCs) for different pieces or components is that the only NDC that can be used to order, to report inventory, report administered vaccines in I-CARE, or to submit vaccine returns is the one listed on the CDC contract, which is the NDC on the outside box. Following is an example product with multiple NDCs.

Example: Pentacel

- 49281-0510-05 Outside Box (Pentacel):
- 49281-0560-05 Liquid Component (DTaP/IPV):

For example, NDC 49281-0510-05 appears on the outside box of Pentacel, and this is the number that is listed on the CDC contract. The powder component, or ActHIB, NDC is 49281-0545-15, and the liquid component, or DTaP/IPV, NDC is 49281-0560-05. The number that should be used when placing vaccine orders, reporting inventory, and submitting vaccine returns is NDC 49281-0510-05, which is the Pentacel NDC on the outside of the box. See example above. When reporting patient records of vaccine administration, the NDC on the outside of the box must be used. The inventory in I-CARE is received electronically from CDC and will have the NDC on the outside of the box.
PROCEDURES FOR RETURNING NONVIABLE VACCINE TO MCKESSON SPECIALTY

Vaccines that are expired/spoiled or wasted must be reported in I-CARE within one (1) week of the expiration date of the vaccine.

If the vaccine(s) were exposed to temperature excursions, complete the vaccine incident report BEFORE wasting the vaccines to determine if the suspected vaccine is viable or not. Fax or email the report, along with the vaccine manufacturer(s) report to the Illinois VFC program at the contact information on the vaccine incident report. The vaccine incident report is available in I-CARE under “reports.”

Failure to report wasted vaccine to the Illinois VFC program may result in your facility no longer being able to receive state-supplied vaccine.

All unopened vials and manufacturer’s pre-filled syringes of spoiled or expired vaccine must be returned within six (6) months of the expiration date for Excise Tax Credit and disposal to McKesson Specialty, regardless of any financial restitution status applied to the vaccine.

Attempting to balance the VFC inventory by reporting the doses as waste (not returned to McKesson) is not acceptable nor is this an appropriate way to account for VFC inventory instead of reporting patient vaccinations on doses administered. VFC providers may be required to replace any excessive amounts of wasted vaccines or frequent reports of wasted vaccines with privately-purchased vaccines.

These transactions are transmitted directly to the Centers for Disease Control (CDC) to report provider’s inventory that is wasted (not returned to McKesson) and expired/spoiled (returned to McKesson). Providers reporting expired/spoiled vaccines will receive an e-mail when the report has been received by CDC and should expect a return label within seven (7) days of the e-mail date. All expired VFC vaccines must be returned to McKesson for excise tax credit.

To enter expired or wasted vaccines in I-CARE:

- Go to the “Vaccines Lots” tab in I-CARE.
- Find the lot number to be reported as expired or wasted and click on the “Add Trans” link.
- Select the appropriate transaction type: Expired/Spoiled (vaccines to be returned to McKesson) or Waste (vaccines cannot be returned to McKesson).
- Select the appropriate waste code to describe why the vaccines can no longer be administered.
- The transaction screen in I-CARE will provide guidance if additional action needs to be taken before the vaccine may be reported as expired or wasted.
- When replacement is required, the replacement vaccines privately purchased by your clinic to replace the wasted/expired VFC vaccines will be entered as part of the transaction reporting expired or wasted vaccines.

The following vaccines should be returned to McKesson:

- Spoiled or expired product in its original vial or manufacturer pre-filled syringe.
- Unused manufacturer pre-filled syringes with an NDC printed on them.
The following vaccines should NOT be returned to McKesson:

- Used syringes, with or without needles
- Broken vials
- Syringe that was drawn up but not used (the VFC program discourages the use of pre-drawing any vaccine)
- Any multi-dose vial from which some doses have been withdrawn (See “VFC and Multi-Dose Vials” section below for more information.)
- IG, HBG, or PPD
- Diluent (expired or not expired)
- Private purchased vaccine.

The items listed above should be disposed of according to usual medical biosafety procedures, and according to your immunization program’s procedures. Federal excise tax (FET) credits can only be processed for unopened vials and for unopened manufacturer prefilled syringes. Returns of product other than these are not eligible for FET credit.

RETURN MAILING LABELS

A return UPS mailing label will be sent to the provider via USPS. The envelope containing the return mailing label is approximately 6.75” x 4.5” and has the wording “Return Label for Expired Vaccines” printed in red font (see the example below). The return mailing label may be addressed generically as “Attn: VFC Vaccine Contact.” Providers may want to advise their mail room of the identity of the VFC Vaccine Contact so the mailing label may be forwarded to the correct person.

Return mailing labels are only valid for 30 days. If the return label has not been used within 30 days, please contact us by clicking on “Contact Us” in I-CARE and select “VFC Illinois” as the category.
VFC AND MULTI-DOSE VIALS

Opened vials of multi-dose vaccines should not be wasted before the manufacturer’s expiration date. The Vaccine Loss and Replacement Policy specifies, “Discarding vaccine before the manufacturer’s expiration date (includes multi-dose vials discarded after 30 days)” as an item that requires replacement by VFC providers. Multi-dose vials of vaccines have different storage and handling requirements than multi-dose vials of medications. VFC providers should ensure their organization’s policy and procedures regarding opened multi-dose vaccine vials are in compliance with VFC policies. Opened, expired vials of Polio cannot be returned to McKesson. Document the vaccine as “Waste (not returned to McKesson) in I-CARE with the waste code of “Open vial but all doses not administered.”


Q. Do vaccines need to follow the 28 day rule?
A. Currently, vaccines are exempted from this requirement. The CDC Immunization Program states that vaccines are to be discarded per the manufacturer’s expiration date. The Joint Commission is applying this approach to all vaccines (whether a part of the CDC or state immunization program or purchased by healthcare facilities) with the understanding that the vaccines are stored and handled appropriately (correct temperature is maintained, frequency of temperature checks, etc.). Following the guidelines provided in the package insert is very important to assure integrity of the vaccine.

According to the General Recommendations on Immunization of the Advisory Committee on Immunization Practices, published January 28, 2011, page 19, “For multi-dose vials that do not require reconstitution, doses that remain after withdrawal of a dose can be administered until the expiration date printed on the vial or vaccine packaging if the vial has been stored correctly and the vaccine is not visibly contaminated, unless otherwise specified by the manufacturer.” CDC MMWR Vol 60 No 2 January 28, 2011 and available at http://www.cdc.gov/mmwr/pdf/rr/rr6002.pdf.

“The Epidemiology and Prevention of Vaccine-Preventable Diseases: The Pink Book: Course Textbook - 13th Edition (2015)” (available at http://www.cdc.gov/vaccines/pubs/pinkbook/vac-storage.html) states, “A multidose vial of vaccine that has been stored and handled properly and is normal in appearance can be used through the expiration date printed on the vial unless otherwise stated in the manufacturer’s product information.”

Sanofi Pasteur has confirmed that multi-dose vials of Polio that have been opened and stored under proper conditions may continue to be used through the products documented expiration date on the vial or on the product box.

Following is a letter from Sanofi Pasteur confirming that multi-dose vials that have been opened and stored under proper conditions may continue to be used through the products documented expiration date on the vial or on the product box.
Dear Healthcare Provider:

This letter is in response to your inquiry regarding multidose vials of IPOL® (Poliovirus Vaccine Inactivated), Typhim® (Typhoid Vi Polysaccharide Vaccine) or Fluzone® (Influenza Virus Vaccine). Sanofi Pasteur Inc. supports the use of our multidose vials of vaccine until the expiration date stamped on the vial provided the product is maintained at the required storage temperature of 2°-8°C (35°-46°F) and is properly handled. This includes vials that have had doses withdrawn from them. However, we advise that multidose vials that have been entered and have not been maintained at 2°-8°C (35°-46°F) should be discarded after 30 minutes (total) exposure to room temperature.

Tubersol®, Tuberculin Purified Protein Derivative (Mantoux) vials must be discarded 30 days after opening as stated in the Package Insert. (1)

The Centers for Disease Control and Prevention (CDC) also supports the use of multidose vials that have had doses withdrawn from them until expiration as referenced below:

Storage and Handling of Immunobiologics-Multidose Vials
Certain vaccines (i.e., quadrivalent meningococcal polysaccharide vaccine [MPSV4], PPSV, TIV, IPV, and yellow fever) are available in multidose vials. Because several doses are withdrawn from the same vial, proper technique must be followed to prevent contamination. For multidose vials that do not require reconstitution, doses that remain after withdrawal of a dose can be administered until the expiration date printed on the vial or vaccine packaging if the vial has been stored correctly and the vaccine is not visibly contaminated, unless otherwise specified by the manufacturer. Multidose vials that require reconstitution must be used within the interval specified by the manufacturer. After reconstitution, the new expiration date should be written on the vial. (2)

(1) Package inserts are available at www.vaccineshoppe.com.

(2) MMWR: General Recommendations on Immunization - January 28, 2011 / 60(RR02) available at http://www.cdc.gov/mmwr/preview/mmwrhtml/rr6002a1.htm?s_cid=rr6002a1_w.

Sanofi Pasteur Inc. provides this information as a service for your personal use. We hope this information is of use to you. If you have any further questions please do not hesitate to contact me at 1-800-822-2463.

Sincerely,

Karen Miskinis

Karen Miskinis RN
Deputy Director
Medical Information Services US
Sanofi Pasteur

Discovery Drive, Swiftwater, Pennsylvania 18370 - Tel.: 800-822-2463 - www.sanofipasteur.us
Additional notes about the Polio vaccine in the multi-dose vial:

- IPOL is licensed for 10 doses and should produce 10 doses.
- Some providers are reporting getting 11 doses out of the 10 dose vial.
- IPOL is not licensed for 11 doses and providers should not be attempting to get an 11th dose.
- If an attempt is made to administer an 11th dose, the patient is probably not getting the full dose and may not be fully protected.
- If a vial of IPOL does not appear full and will not provide 10 doses, contact the vaccine manufacturer to report it and request to have them replace it. If the vaccine is replaced by the manufacturer, notify IDPH of the replacement by clicking on “Contact Us” in I-CARE.

PROVIDER-TO-PROVIDER TRANSFER OF VACCINES

CDC and the VFC program discourage regular transport of vaccines. The VFC program prefers that vaccines remain at the original location where they were initially delivered to avoid a possible break in the cold chain rendering the vaccine non-viable.

- Proper management of vaccine inventory plays a major role in preventing the need to transport vaccines.
- IDPH must review and approve all requests to transfer vaccines BEFORE the transfer occurs.
- Given that providers generally receive vaccine within a week of approval, more frequent orders are preferred over large orders that may increase the risk of expiry in the provider’s office.

If transport must occur, the VFC program strongly recommends the use of a data logger with continuous monitoring and recording capabilities.

- All data loggers should have a current and valid certificate of calibration.
- The VFC program does not recommend, or find as an acceptable alternative, one-time use temperature indicators since they do not provide adequate data on excursions that may occur during transport.

TRANSPORT OR SHIPPING

The terms “transport” and “shipping” have different meanings although often used interchangeably.

- Transport involves the movement of vaccine over a short time and distance between providers.
- Transport is typically performed by providers using private vehicles or courier services.
- The expected length of transport is less than eight (8) hours or regular business day.
- The VFC program’s expectation is that transporting vaccines should be an extremely rare occurrence.
- Shipping, as compared to transport, typically involves further distance and time to move vaccine between locations.
- Often, vaccine is moved using a large, shipping management service and requires adherence to shipping standards that go beyond CDC guidance for the transport of vaccine.
- The VFC program does not allow providers to ship vaccines due to the potential risks to the cold chain and ultimately the viability of the vaccine.
PROCEDURE

Providers who have excess vaccine on hand that will not be used in three to six months before expiration are encouraged to transfer this vaccine to other Illinois VFC providers to utilize, and thus avoid being charged for wasted vaccine. Providers should begin this process within three to six months of the vaccine expiring. It is the provider’s responsibility to find another provider willing to accept the vaccine, and also to properly pack and ship the vaccine to that provider following standard cold-chain procedures. Providers must allow up to 10 business days for transfer approval requests to be reviewed.

Transfers should only occur for the following reasons:

- Vaccine is six months or less from outdate, and unable to be used by provider.
- Area outbreak resulting in unexpected surge of walk-in patients.
- Clinic closure requiring redistributing vaccines to other VFC providers.
- Seasonal clinic needing to transfer vaccine to other VFC providers at end of time facility will be open. (i.e. School Health Clinic or Racing Industry)

Providers may not transfer influenza vaccine. Varicella-containing vaccines (MMRV, VAR) may only be transported in a portable freezer. IDPH will review requests to transport varicella-containing vaccines on a case-by-case basis to ensure transportation guidelines are followed.

If a provider needs a vaccine, they may order the vaccine as vaccine orders are usually shipped sooner than the 10 business days it could take to approve a transfer of vaccines. Transfers should be done on a rare basis and only for the reasons stated above. Vaccines should remain with the original location it was delivered to if at all possible, to avoid a possible break in the cold chain rendering the vaccine non-viable.

Providers must obtain pre-approval from IDPH before any transfers. The transfer pre-approval request form, with transportation guidelines, is available in I-CARE on the home page under “Immunization Links.”

If a provider cannot be located to accept transferred vaccine, document attempted contacts on the vaccine transfer contact log available in I-CARE on the home page under “Immunization Links.” If the vaccines must be wasted, email or fax the completed vaccine transfer contact log to IDPH for review and consideration in the vaccine replacement decision. It is not required to document all contacts about transferring vaccines. However, if vaccines must be reported as expired, we will consider attempts to transfer the vaccines in the vaccine replacement decision.

VACCINE TRANSPORTATION GUIDELINES

Vaccine Transportation Recommendations

- CDC discourages regular transport of vaccines. The VFC program prefers that vaccines remain at the original location where they were initially delivered to avoid a possible break in the cold chain rendering the vaccine non-viable.
- The shipment of vaccines by a provider through a commercial carrier is not allowed due to the potential risks to the cold chain.
- Providers must maintain the vaccine cold chain at all times to protect the vaccine potency.
• If you cannot ensure the vaccine has been stored under proper conditions to maintain the cold chain, then DO NOT transport the vaccines.
• If you cannot ensure vaccines are transported under proper conditions to maintain the cold chain, then DO NOT transport the vaccines.

Vaccine Transportation Standard Operating Procedures

1. Vaccines are attended at all times during transport.
2. Vaccines are never placed in the trunk of a vehicle.
3. Vaccines are delivered directly to the facility.
4. Receiving facility promptly unpacks and appropriately stores vaccines.
5. Use a calibrated temperature monitoring device with continuous monitoring and recording capabilities during transport.

Varicella-Containing Vaccines

The vaccine manufacturer does not recommend transporting varicella-containing vaccines (MMRV, VAR). If these vaccines must be transported, CDC recommends the following transportation guidelines.

• Transport only in a portable freezer unit that maintains the temperature between -58°F and +5°F (-50°C and -15°C).
  
  Use of dry ice is not recommended, even for temporary storage or emergency transport. Dry ice may subject varicella-containing vaccines to temperatures colder than -58°F (-50°C).

• IDPH will review requests to transport varicella on a case-by-case basis to ensure transportation guidelines are followed.
Packing Vaccines for Transport

1. Gather the supplies

   **Hard-sided coolers or Styrofoam™ vaccine shipping containers**
   - Coolers should be large enough for your location's typical supply of refrigerated vaccines.
   - Can use original shipping boxes from manufacturers if available.
   - Do NOT use soft-sided collapsible coolers.

   **Conditioned frozen water bottles**
   - Use 16.9 oz. bottles for medium/large coolers or 8 oz. bottles for small coolers (enough for 2 layers inside cooler).
   - Do NOT reuse coolant packs from original vaccine shipping container, as they increase risk of freezing vaccines.
   - Freeze water bottles (can help regulate the temperature in your freezer).
   - Before use, you must condition the frozen water bottles. Put them in a sink filled with several inches of cool or lukewarm water until you see a layer of water forming near the surface of bottle. The bottle is properly conditioned if ice block inside spins freely when rotated in your hand.

   **Insulating material — You will need two of each layer**
   - **Insulating cushioning material** — Bubble wrap, packing foam, or Styrofoam™ for a layer above and below the vaccines, at least 1 in thick. Make sure it covers the cardboard completely. Do NOT use packing peanuts or other loose material that might shift during transport.
   - **Corrugated cardboard** — Two pieces cut to fit interior dimensions of cooler(s) to be placed between insulating cushioning material and conditioned frozen water bottles.

   **Temperature monitoring device** — Digital data logger (DDL) with buffered probe. Accuracy of ±1°F (±0.5°C) with a current and valid certificate of calibration testing. Pre-chill buffered probe for at least 5 hours in refrigerator. Temperature monitoring device currently stored in refrigerator can be used, as long as there is a device to measure temperatures for any remaining vaccines.

   **Why do you need cardboard, bubble wrap, and conditioned frozen water bottles?**
   Conditioned frozen water bottles and corrugated cardboard used along with one inch of insulating material such as bubble wrap keeps refrigerated vaccines at the right temperature and prevents them from freezing. Reusing vaccine coolant packs from original vaccine shipping containers can freeze and damage refrigerated vaccines.

2. Pack for transport

   **Conditioning frozen water bottles**
   - Put frozen water bottles in sink filled with several inches of cool or lukewarm water or under running tap water until you see a layer of water forming near surface of bottle.
   - The bottle is properly conditioned if ice block inside spins freely when rotated in your hand.
   - If ice “sticks,” put bottle back in water for another minute.
   - Dry each bottle.
   - Line the bottom and top of cooler with a single layer of conditioned water bottles.
   - Do NOT reuse coolant packs from original vaccine shipping container.
3. **Arrive at destination**

**Before opening cooler** – Record date, time, temperature, and your initials on vaccine temperature log.

**Storage** – Transfer boxes of vaccines quickly to storage refrigerator.

**Troubleshooting** – If there has been a temperature excursion, contact vaccine manufacturer(s) and/or your immunization program before using vaccines. Label vaccines “Do Not Use” and store at appropriate temperatures until a determination can be made.

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**PROVIDER MOVING TO A NEW LOCATION**

VFC providers planning to move their clinic to a new location must notify the immunization program before the clinic moves so the equipment and plan to transport the VFC vaccines may be reviewed and approved. Contact the immunization program at [DPH.Vaccines@illinois.gov](mailto:DPH.Vaccines@illinois.gov) or by telephone at 217-786-7500.

Moving or installing a new refrigerator and freezer will take time to stabilize the temperatures within the unit. It may take two to seven days to stabilize the temperature between 2 C and 8 C (36 F and 46 F) in a newly installed or repaired refrigerator. Likewise, it may take two to three days to stabilize the temperature between -58 F and +5 F (-50 C and -15 C) in a newly installed or repaired freezer.
VFC providers must allow a week of refrigerator and freezer temperature readings/recordings a minimum of two times each workday, including minimum/maximum temperatures one time each morning to make sure temperatures are within appropriate ranges before using units to store vaccines. (Source: CDC Storage and Handling Toolkit).

**VFC PROVIDER UNENROLLMENT**

Unfortunately, some circumstances may occur that necessitate VFC providers unenrolling from their role as an approved provider. The cause for these circumstances may vary, but timely and appropriate notification by the provider is desired and expected. The following steps should occur:

- The clinic should complete the VFC provider unenrollment form available in I-CARE and fax or e-mail to the Illinois VFC program. Be sure to include your handwritten temperature logs for the previous three months and your current physical VFC inventory you have in stock.
- If the enrollment agreement is terminated, the provider agrees to properly return any unused VFC vaccine within 30 days of the termination date. The provider may not continue to administer VFC vaccines after the termination date.
- If the clinic is able to provide documentation of the cold chain being maintained, the clinic must find another VFC provider to transfer their remaining vaccines. The Department will review documentation of the cold chain and advise the provider of next steps.
- The Department will contact the provider to follow up on the unenrollment notification.
7. VFC SITE VISITS

To ensure the quality of VFC vaccine and the integrity of the VFC program, the Department conducts the following type of provider site visits.

- Enrollment site visits (see chapter 3 for details)
- Compliance site visits
- Storage and handling site visits

VFC visits help determine compliance with VFC program requirements. This includes identifying potential issues with VFC vaccine accountability and determining whether VFC vaccines are being handled, stored, and administered in accordance with the laws and policies governing the VFC program.

The review and evaluation of VFC provider practices involves assessing verbal, written, and visual evidence encountered during the visit to determine if provider sites are following the requirements of the VFC program.

The goals of these visits are to:

- Identify areas where providers are doing well and areas needing additional follow-up
- Identify the educational needs of VFC providers in order to support them with meeting program requirements
- Ensure that VFC-eligible children receive properly managed and viable vaccine

Additionally, site visits are critical opportunities to engage provider staff and develop and strengthen ongoing relationships.

As defined in the VFC enrollment agreement, VFC providers agree to participate in VFC program compliance site visits including unannounced visits, and other educational opportunities associated with VFC program requirements.

VFC compliance staff finding or observing storage and handling practices that compromise the safety and efficacy of the VFC vaccines have the authority to act on behalf of the Department to retrieve and remove the VFC vaccines from the provider. Replacement may be required under the VFC Vaccine Loss and Replacement policy.

VFC COMPLIANCE VISIT

All enrolled and active VFC providers must receive a VFC compliance site visit every 24 months, at minimum, to ensure compliance with VFC program standards.

- Enrolled and active providers are providers that are enrolled in the VFC program and have ordered vaccine within the past 12 months.
- Conducting a VFC compliance site visit with providers every other year is a minimum-level requirement. Providers may receive a VFC compliance site visit on a more frequent basis.
- A new provider must be enrolled and active in the VFC program at least three to six months before receiving a VFC compliance site visit.
The VFC compliance visit requires availability of key staff that can accurately provide a realistic picture of how the clinic is implementing the VFC program on a daily basis. The VFC compliance site visit includes staff guidance and education on “best practices” to store and manage VFC vaccines, ensure all VFC-eligible children are receiving properly maintained vaccines, and address practice-based questions about VFC program initiatives.

**STORAGE AND HANDLING SITE VISIT**

The vaccine storage and handling visit serves as a “spot check” for proper practices on storage and handling of VFC vaccine. The goal of these visits is to provide guidance and education, to protect the vaccine, and to ensure VFC-eligible children are receiving properly managed vaccines.

VFC providers may be prioritized for a storage and handling visit based on the following:

- The provider’s previous history with storage and handling compliance issues;
- Time since the last site visit;
- A newly enrolled provider; or
- Providers having excessive or habitual waste in the previous 12 months. Excessive waste is defined as wasted vaccine amounts that either exceeds $1,500 in value or three (3) percent of the total amount of vaccines received in the previous 12 months.

The current vaccine storage and handling toolkit was updated in June 2016 and is available at [http://www.cdc.gov/vaccines/recs/storage/toolkit/storage-handling-toolkit.pdf](http://www.cdc.gov/vaccines/recs/storage/toolkit/storage-handling-toolkit.pdf). The toolkit outlines best practice strategies and recommendations on the following:

- Vaccine cold chain
- Storage and handling plans
- Staff
- Vaccine storage equipment
- Temperature monitoring equipment
- Vaccine storage and handling best practices
- Storage unit temperature monitoring
- Troubleshooting
- Vaccine inventory management
- Vaccine deliveries
- Vaccine transport
- Vaccine preparation
- Vaccine disposal

Please be advised that checks to monitor vaccine storage unit temperatures by pharmaceutical representatives or other entities do not satisfy the CDC mandate for storage and handling visit requirements.

**CONDUCTING THE SITE VISIT**

The VFC site visits are conducted either by the Department’s immunization staff or by local health departments trained by the Department to act as delegates to perform compliance visits.
FOLLOWING UP AFTER THE SITE VISIT

During or at the end of the VFC compliance site visit, VFC staff shall provide education to the provider staff when non-compliant behaviors or practices are observed or encountered in order to correct the situations. If the provider is found to be non-compliant, a provider follow-up plan will be completed and reviewed with the provider office.
8. FRAUD AND ABUSE

OVERVIEW

As childhood vaccines become more expensive and immunization programs more complex, the VFC program becomes vulnerable to fraud and abuse. A working understanding of what constitutes fraud and abuse is critical for all persons working in the VFC program. Consistent with “fraud” and “abuse” as defined in the Medicaid regulations at 42 CFR § 455.2, and for the purposes of this guide, the following definitions will be used:

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 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 patient); or in reimbursement for services not medically necessary or fail to meet professionally recognized standards for health care. Abuse also includes recipient practices that result in unnecessary cost to the Medicaid program.

The following are additional definitions used in the VFC program.

Oversight: Illinois specifies any suspected case of fraud and abuse should immediately be reported to the Department’s VFC administrator, coverage level administrator, or immunization section chief. Within five working days, the Department’s Immunization Program will contact the provider in question or the person reporting the suspected fraud and abuse to perform an in-depth interview, with documentation recorded on the Department’s fraud and abuse form. A file will be established for each provider suspected of fraud and abuse with a copy of all verbal and written correspondence maintained, as well as maintaining a fraud and abuse referral database. The Department’s Immunization Program will follow-up with the external agency within ten working days, or sooner.

Enforcement: If the VFC program determines from the assessment of information available that the situation requires referral for further investigation by an outside agency, the VFC program will make these referrals within ten working days from assessment. All suspected cases of fraud and abuse that require further investigation must be referred first to the immunization section chief or equivalent for referral to the Medicaid Integrity Group (MIG) and the CDC, with notification of the referral also sent to Department’s legal counsel and auditor.

Termination: The Department’s Immunization Program has the right to exclude or terminate providers from the VFC program that are not following any Illinois VFC program or I-CARE requirements. Vaccine will be removed from the provider’s possession and the provider will be prohibited from receiving future shipments until the exclusion is lifted. The terminated provider or entity may be eligible to re-apply for the VFC and I-CARE Programs after the exclusion is lifted. The Illinois VFC program will terminate providers from participating in the VFC program if the provider is found to be in non-payment status under Medicare, Medicaid, and other federal health care programs. Termination of providers may also occur due to Office of Inspector General (OIG) sanction, failure to renew license or certification registration, revocation of professional license or certification, or termination by the Illinois Medicaid Agency. Providers that are terminated from the VFC program (both voluntarily and involuntarily) will be
removed from active status in the VFC program, removed from VFC State of Illinois Rapid Electronic Notification (SIREN) lists, and excluded on reports to the Illinois Medicaid agency requesting data on active VFC providers.

All cases of suspected fraud and abuse will be handled according to this policy and the CDC Non-Compliance with VFC Requirements Protocol.

**FRAUD AND ABUSE POLICY**

The Fraud and Abuse Policy is a comprehensive written policy that addresses prevention, detection, investigation, and resolution of fraud and abuse allegations. VFC staff must be familiar with this policy and be able to prevent, to identify and to follow-up on situations that involve suspected fraud or abuse of the VFC program.

When providers enroll in the VFC program, they agree to comply with all the requirements of the program. Lack of adherence to the VFC program requirements by an enrolled provider could lead to fraud and abuse of the VFC program by that provider.

Failure to comply with VFC requirements is defined as:

- Any VFC-enrolled provider who is identified as not maintaining any of the federal requirements for the VFC program as defined in the enrollment agreement.

Failure to comply may be identified by:

- VFC program staff
- The enrolled provider’s staff, or
- A third party

Non-compliance with program requirements may occur due to an unintentional lack of understanding of the VFC program requirements, or the behavior may be intentional. **If the non-compliance appears intentional and the provider has received financial benefits from the behavior, the situation would require immediate referral to an outside agency for investigation of suspected VFC fraud and abuse.**

**EXAMPLES OF FRAUD AND ABUSE**

Fraud or abuse can occur in many ways, and some types of fraud and abuse are easier for the VFC program to prevent or detect than others, depending on how the VFC program is implemented. The VFC program will use provider profiles, ordering patterns, VFC site visits, temperature logs and doses administered reports to monitor provider compliance with VFC program requirements. Some examples of potential fraud are:

- Providing VFC vaccine to non-VFC-eligible children
- Selling or otherwise misdirecting VFC vaccine
- Billing a patient or third party for VFC-funded vaccine
- Charging more than the established maximum regional charge ($23.87) for administration of a VFC funded vaccine to a federally vaccine-eligible child
- Denying VFC-eligible children VFC-funded vaccine because of parents’ inability to pay for the administration fee
• Failing to implement provider enrollment requirements of the VFC program
• Failing to screen for and document eligibility status at every visit
• Failing to maintain VFC records and comply with other requirements of the VFC program
• Failing to fully account for VFC-funded vaccine
• Failing to properly store and handle VFC vaccine
• Ordering VFC vaccine in quantities or patterns that do not match the provider’s profile or otherwise over-ordering VFC doses of vaccine
• Waste of VFC vaccine

**ALLEGATIONS OF SUSPECTED FRAUD AND ABUSE**

The Department will investigate all allegations of suspected fraud and abuse and will determine if the situation is intentional fraud and abuse or unintentional abuse or error due to an excusable lack of knowledge of the VFC program with no purposeful intent to misrepresent or defraud the VFC program. If the situation is found to be unintentional, an educational intervention will be made, and arrangements will be established to replace any vaccine used inappropriately.

The Department’s Immunization Program staff will provide in-depth education to the provider’s key staff about the VFC program and Illinois VFC enrollment and accountability requirements. The provider will be required to complete and return an acknowledgement of receipt of the follow-up plan detailing the steps that will be taken to prevent further incidents. This signed plan must be returned within one month. The provider will be advised that any recurrence of suspected fraud and abuse may result in termination from the VFC program and referral to an external agency for investigation.
If the investigation determines the situation is intentional, the situation will be reported to an external agency for investigation. All suspected cases of fraud and abuse that require further investigation will first be referred to the immunization section chief or equivalent for review by the Office of Health Protection and the Department’s legal counsel and auditor. Suspected cases of fraud and abuse will then be referred to the Medicaid Integrity Group (MIG) and the CDC.

Suspected cases of fraud and abuse will be referred to the Centers for Medicare and Medicaid Services (CMS), Medicaid Integrity Group (MIG) Field Office for further investigation. CMS/MIG may refer the suspected case to the appropriate state Medicaid agency for further investigation. VFC ordering privileges may be suspended when a referral is made to CMS/MIG. Depending on the outcome of any investigation by CMS/MIG and/or the appropriate state Medicaid agency, providers may be required to, among other things, return all VFC vaccine, reimburse the state for the cost of used vaccines, and/or potentially be terminated from the VFC program. The Department reserves any and all rights with respect to any future action.

**FRAUD AND ABUSE CONTACTS**

Suspected VFC fraud or abuse may be reported to any of the following Department staff.

- Linda Kasebier, VFC Administrator, is designated as the primary contact.  
  Linda.Kasebier@illinois.gov
- Karen Pendergrass, Immunization Coverage Level Administrator, is designated as first back-up.  
  Karen.Pendergrass@illinois.gov
- Gina Lathan, Immunization Section Chief, is designated as second back-up.  
  Gina.Lathan@illinois.gov

Each of these individuals may be contacted at:

525 W. Jefferson Street, 1st Floor  
Springfield, IL 62761  
217-785-1455

**ONGOING PROVIDER MONITORING PROCEDURES**

The Illinois VFC program will exclude providers from participating in the VFC program if the provider is found to be in non-payment status under Medicare, Medicaid, and other Federal health care programs. Exclusion of providers also may occur due to Office of Inspector General (OIG) sanction, failure to renew license or certification registration, revocation of professional license or certification, or termination by the state Medicaid agency. The Illinois Immunization Program will monitor OIG exclusions by checking the List of Excluded Individuals and Entities on the OIG website upon provider enrollment at oig.hhs.gov/fraud/exclusions.asp. This list will be checked monthly thereafter and compared to currently enrolled providers. Claims are not processed by Medicaid for providers on the OIG list.

Providers are strongly encouraged to check the OIG website list of excluded individuals/entities prior to hiring or contracting with any individuals or entities. Enrolled providers who employ a person (including, but not limited to, physicians, mid-level practitioners, nurses or nursing aides) from the excluded provider list will be terminated from the program and the state Medicaid and MIG agencies will be notified.
The Department’s Immunization Program also has the right to exclude providers not following any other Illinois VFC program or I-CARE requirements. Vaccine will be removed from the provider’s possession and the provider will be prohibited from receiving future shipments until the exclusion is lifted. The excluded provider or entity will be required to re-apply for the VFC and I-CARE Programs after the exclusion is lifted. The Illinois Immunization Program may share information with the state attorney’s office, and the Medicaid Fraud and Abuse Unit regarding allegations and exclusions due to fraud and abuse.

REPORTING VFC PROVIDER TERMINATIONS

Providers terminated from the VFC program (both voluntarily and involuntarily) will be removed from active status in the VFC program, removed from State of Illinois Rapid Electronic Notification System (SIREN) lists and excluded on reports to the state Medicaid agency requesting data on active VFC providers.
APPENDICES

The following documents are located in the appendix.

- VFC Eligibility Status Codes
- VFC Tip Sheet – Certificate Calibration Expiration Dates
- VFC Tip Sheet – Transfer Contact Log
- VFC Tip Sheet – Transfer Provider Report
- VFC Tip Sheet – Vaccine Storage Unit Checklist
- Glossary of Important VFC Terms
VFC ELIGIBILITY STATUS CODES

The Centers for Disease Control and Prevention has updated the VFC eligibility codes. The complete list of codes is shown in the following table.

<table>
<thead>
<tr>
<th>Code</th>
<th>Label</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>V01</td>
<td>Not VFC eligible</td>
<td>Client does not qualify for VFC because they do not have one of the statuses below. (V02-V05)</td>
</tr>
</tbody>
</table>
| V02  | VFC eligible – Medicaid/Medicaid Managed Care | All of the following are true:  
- Client is currently eligible for Medicaid or Medicaid managed care  
- Client is < 19 years old  
- The type of vaccine administered is eligible for VFC funding |
| V03  | VFC eligible – Uninsured | All of the following are true:  
- Client does not have health insurance  
- Client is < 19 years old  
- The type of vaccine administered is eligible for VFC funding |
| V04  | VFC eligible – American Indian/Alaska native | All of the following are true:  
- Client is a member of a federally recognized tribe  
- Client is < 19 years old  
- The type of vaccine administered is eligible for VFC funding |
| V05  | VFC eligible – underinsured at FQHC/RHC/deputized provider | All of the following are true:  
- Client has insurance but insurance does not cover vaccines, limits the vaccines covered or caps vaccine coverage at a certain amount  
- Client is receiving care at an FQHC, RHC or deputized provider  
- Client is < 19 years old  
- The type of vaccine administered is eligible for VFC funding |
| V22  | CHIP | Client is eligible for the CHIP program (Medicaid Title XXI [21] or State-funded), a separate state health insurance that is NOT a Medicaid expansion program. The patient is not eligible for VFC vaccines. |
| V23  | 317 | Client is eligible to receive vaccines under the state/program immunization policy and the vaccine administered is eligible for 317 funding. This should only be used upon direction by IDPH. |
| V24  | Medicare | Client is enrolled in Medicare. The patient is not eligible for VFC or 317 funded vaccines. |
| V25  | State program eligibility | Client is eligible for a state vaccine program. The patient is not eligible for VFC or 317 funded vaccines. |
All Vaccines For Children (VFC) providers are required to have a certified calibrated data logger in each appliance compartment storing VFC vaccines, as well as a back-up thermometer on site (but not actively being used to monitor storage units). The calibration expiration date must be entered in I-CARE and updated as expiring data loggers are recalibrated or replaced. **Illinois VFC providers’ ordering privileges may be suspended for having data loggers with expired certificates of calibration or thermometers that are not data loggers.** The VFC program recommends providers either have their data loggers recalibrated or purchase new data loggers BEFORE their existing monitoring devices expire. The VFC program also recommends backup data loggers have a different date of calibration so that providers do not have all of their certificates of calibration expiring at the same time.

This tip sheet will show how to update the expiration dates in I-CARE.

1. Go to the “Vaccines” page in I-CARE. See the screen shot below.
2. Go to the “Temperature Log” tab.
3. Select view for “Appliances/Backup Thermometer.”
4. In the listing of appliances, find the appliance or back-up thermometer that you need to update the certificate of calibration expiration date. Click on the appliance name.
5. The appliance window or backup thermometer window will open. See the screen shots on the next page.
6. Go to the field labeled “Certified Expire Date.” You can either type the new expiration date in the field or click on the calendar link to select the date.
7. Click “Save.”
8. **If your VFC ordering privileges were suspended because of expired certificates of calibration, click on “contact Us” in I-CARE and select “VFC Illinois” to notify us after you have updated your expiration dates in I-CARE. We will discuss any documentation requirements. Be sure to include your VFC PIN on all communications.**
Notes:

- The Illinois VFC program will allow an expiration date of a maximum of two years from the date calibration testing was performed, even if the expiration date listed is one year since the calibration date.
- All data loggers listed as “Active” in I-CARE, including backup data loggers, must have a corresponding certificate of calibration on file.
- Once an appliance has been entered, the type of appliance or the type of unit cannot be changed. If the appliance has been replaced or no longer being used, mark the current appliance in I-CARE under “Active” as “No.” Then enter the new appliance.
Providers who have excess VFC vaccine on hand that will not be used in three to six months before expiration are encouraged to transfer the vaccines to other Illinois VFC providers to utilize, and thus avoid being charged for wasted vaccine. Providers should begin this process within three to six months of the vaccine expiring. It is the provider’s responsibility to find another provider willing to accept the vaccine and also to properly pack and ship the vaccine to that provider following standard cold-chain procedures. It is not necessary to have one provider accept all the vaccines for transfer. Refer to the Vaccine Transfer Approval Request Form for transfer guidelines.

If a provider cannot be located to accept transferred vaccine, VFC providers should document attempted contacts on the vaccine transfer contact log. If the vaccines must be wasted, email or fax the completed vaccine transfer contact log to IDPH for review and consideration in the vaccine replacement decision. It is not required to document all contacts about transferring vaccines. However, if vaccines must be reported as expired, we will consider attempts to transfer the vaccines in the vaccine replacement decision.

1. This report is accessible on the I-CARE home page under “Immunization Links.”
2. Click on the report for “VFC Vaccine Transfer Contact Log.”
3. The form will open as a fillable PDF.
4. Complete the information for your provider.
5. Enter the details on the expiring vaccines for transfer.
6. Document the providers you have contacted about the transfer. The following information must be documented:
   - Date of contact
   - The VFC PIN and facility name for the provider contacted
   - The name of the VFC coordinator you contacted.
   - If the transfer was accepted (even for part of the vaccines) or refused.

The greater the number of providers contacted about transferring vaccines will have a more positive impact on the decision whether vaccine replacement is required.

If the vaccines must then be wasted due to expiration, send the completed vaccine transfer contact log by email to DPH.Vaccines@illinois.gov or fax 217-786-7506.
VFC providers may print a report from I-CARE listing other currently enrolled and active VFC providers to contact about vaccine transfer. This report is only valid for contacts about vaccine transfers and should not be utilized for any other purpose. Refer to the vaccine transfer approval request form for transfer guidelines.

1. This report is accessible in I-CARE by going to the “Vaccines” menu, then clicking on the “Reports” tab.
2. Under VFC Reports, click on the report for “VFC Providers.”
3. You may select the provider list by selecting just the county you are in or by county and city.
4. Click “Print This Report.”
In accordance with documentation requirements set forth by Federal law Statute 42 US Code 300aa-25 and 300aa-26, all VFC providers must maintain immunization records for every VFC vaccine dose administered with all of the following information documented in the patient’s medical record (or permanent office log or file):

1. Name of the vaccine administered;
2. Date the vaccine was administered;
3. Date the VIS was given or offered;
4. Publication date of the VIS;
5. Name of the vaccine manufacturer;
6. Lot number;
7. Name and title of person who administered the vaccine; and
8. Address of clinic where vaccine was administered

Vaccine providers must give the appropriate VIS to the patient (or parent or legal representative) prior to each dose of vaccine. The date the vaccine was administered does not indicate the VIS was given or offered. The date the VIS was given or offered must be specifically documented.

Following are two examples of vaccine administration records: the first example is a paper vaccine administration record and the second example is an electronic medical record (EMR).

**Example 1: Paper vaccine administration record**

*In order to accept the vaccinator initials, the clinic must be able to produce a permanent office log or file with the names and titles of the vaccinators (past and present).*
A review of the paper vaccine administration record shows the following results when checking for the eight required elements.

1. **Name of the vaccine administered**: In this example, the name of the vaccine administered is not stated on all vaccines. The Hepatitis B vaccine should have stated the name of the vaccine instead of just “HepB.” The vaccine administered was probably Recombivax based upon the manufacturer, but the provider is required to document the name of the vaccine administered. The DTaP vaccines may be either Daptacel or Pentacel based upon the manufacturer, but we cannot determine which vaccines were administered. This required element is missing.
2. **Date the vaccine was administered**: All of the dates for the vaccines are completed.
3. **Date the VIS was given**: In the sample, the date the provider gave the VIS to the parents/guardians is completed for all vaccines.
4. **Publication date of the VIS**: The publication date on the VIS is correct based upon the date the vaccines were administered.
5. **Name of the vaccine manufacturer**: The abbreviations for the manufacturers are acceptable.
6. **Lot number**: In this sample, all of the lot numbers are complete.
7. **Name and title of person who administered the vaccine**: In this sample, the vaccine administration record only has the initials of the person, which would not be acceptable. This clinic does have a permanent office log of current and past employees (Figure 2), which would be acceptable.
8. **Address of clinic where vaccine was administered**: This clinic has their address pre-printed on all the vaccine administration records.

![Figure 2. Sample permanent office file with the names and titles of the past and present clinic vaccinators.](image)
Example 2: EMR vaccine administration record

Figure 3. Sample EMR vaccine administration record with elements numbered.

A review of the EMR vaccine administration record shows the following results when checking for the eight required elements.

1. **Name of the vaccine administered**: In this example, the name of the vaccine administered is stated as the vaccine type, IPV from Aventis. Sanofi Pasteur is also known as Aventis. The vaccine should state which vaccine was administered. Other vaccines should be checked to see if the vaccine administration record will only state the vaccine type (DTaP) or the vaccine name (Infanrix, Kinrix, Pediarix, or Pentacel).

2. **Date the vaccine was administered**: The date of vaccine administration is complete.

3. **Date the VIS was given**: In this sample, the EMR has a field for the VIS given date, but the date was not entered. If the EMR did not have a dedicated field, the provider should enter “VIS Given” and the date in the note field.

4. **Publication date of the VIS**: The publication date on the VIS only has the year. The provider should list the entire date of 01/01/2000 instead of just 2000. Some VIS’ have had multiple publication dates within the same year.

5. **Name of the vaccine manufacturer**: The manufacturer is complete.

6. **Lot number**: In this sample, the lot number is complete.

7. **Name and title of person who administered the vaccine**: In this sample, the name and title of the person who administered the vaccine is entered in the vaccine administration record.

8. **Address of clinic where vaccine was administered**: For this sample EMR vaccine administration record, the address of the clinic is not shown. When the patient’s immunization record is printed (as shown in Figure 4), we do see the address of the clinic. This is acceptable.
Figure 4. Sample printed patient immunization record with clinic address.
GLOSSARY OF IMPORTANT VFC TERMS

ADVISORY COMMITTEE ON IMMUNIZATION PRACTICES (ACIP)
The ACIP consists of 15 experts in fields associated with immunization who have been selected by the HHS Secretary to provide advice and guidance to the Secretary, the Assistant Secretary for Health, and CDC on the control of vaccine-preventable diseases. The Committee develops written recommendations for the routine administration of vaccines to children and adults in the civilian population; recommendations include age for vaccine administration, number of doses and dosing interval, and precautions and contraindications. The ACIP is the only entity in the federal government that makes such recommendations. VFC resolutions passed by the ACIP form the basis for VFC program policies on vaccine availability and usage. They may not necessarily match the general usage recommendations of the ACIP, but rather represent the rules that providers must follow for administering each specific vaccine under the VFC program.

CENTERS FOR MEDICARE AND MEDICAID SERVICES (CMS)
Agency that provides oversight of the Medicare and Medicaid programs. Funding for VFC program is allocated through this agency.

CHIP (CHILDREN’S HEALTH INSURANCE PROGRAM)
Authorized under Title XXI of the Social Security Act, jointly financed by the Federal and State governments and administered by the States. The program provides insurance to children in families with incomes that are above Medicaid eligibility but do not have access to private insurance. Within broad Federal guidelines, each State determines the design of its program, eligibility groups, benefit packages, payment levels for coverage, and administrative and operating procedures.

In Illinois, children covered under Medicaid Title XXI (21) or State Funded have CHIP coverage. Children with CHIP are considered insured and are NOT VFC-eligible. Children needing vaccinations who have Medicaid Title XXI (21) or State Funded, the state’s Child Health Insurance Program (CHIP) coverage are not eligible to receive VFC program vaccines. Participants through age 18 with Medicaid Title XIX (19) coverage are VFC eligible and may continue to receive vaccines through the VFC program. VFC providers must privately purchase vaccines for administration to children with Medicaid Title XXI (21) or State Funded CHIP coverage and seek reimbursement from HFS.

DEPUTIZATION AGREEMENT
A formal agreement through a Memorandum of Understanding (MOU), whereby Federally Qualified Health Centers (FQHCs) or Rural Health Clinics (RHCs) delegate their VFC authority for vaccinating underinsured children to local health departments (LHDs), who then vaccinate underinsured children as agents of the FQHC/RHC. A current, approved MOU does not have an expiration date and does not need to be completed annually, but should be reviewed on an annual basis. The only time a new one MOU needs completed is when there is a change in Medical Director at the LHD. A change in administrator at IDPH, the FQHC/RHC, or LHD WILL NOT require the completion of a new MOU. For more information on deputization agreements, please contact the VFC program at DPH.Vaccines@illinois.gov or 217-786-7500.
DEPARTMENT OF HEALTH AND HUMAN SERVICES, OFFICE OF INSPECTOR GENERAL (OIG)
Office mandated to protect the integrity of Department of Health and Human Services (HHS) programs and their beneficiaries. It is generally responsible for identifying, communicating and correcting activities of waste, fraud or abuse within HHS programs.

FAMILY PLANNING CLINIC
Clinic or provider whose main purpose is to prescribe contraceptives. This does not included school-based clinics or any VFC-enrolled provider whose main services are primary or acute care services.

FEDERALLY QUALIFIED HEALTH CENTER (FQHC)
Health center that is designated by the Bureau of Primary Health Care (BPHC) of the Health Services and Resources Administration (HRSA) to provide health care to a medically underserved population. FQHCs include community and migrant health centers, special health facilities such as those for the homeless and persons with acquired immunodeficiency syndrome (AIDS) that receive grants under the Public Health Service (PHS) Act, as well as “look-alikes,” which meet the qualifications but do not actually receive grant funds. They also include health centers within public housing and Indian Health Service centers.

FEDERAL REGISTER
The Federal Register is the official daily publication for rules, proposed rules, and notices of Federal agencies and organizations, as well as executive orders and other presidential documents.

FEDERALLY VACCINE-ELIGIBLE CHILD
Also known as VFC-eligible child. A child who is eligible to receive VFC vaccine.

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.

FULLY INSURED
Anyone with insurance that covers the cost of vaccine, even if the insurance includes a high deductible or co-pay, or if a claim for the cost of the vaccine and its administration would be denied for payment by the insurance carrier because the plan’s deductible had not been met.

INDIAN (AMERICAN INDIAN OR ALASKA NATIVE)
As defined by the Indian Health Care Improvement Act (25 U.S.C. 1603):

“Indians” or “Indian”, unless otherwise designated, means any person who is a member of an Indian tribe, as defined in subsection (d) of this section, except that, for the purpose of sections 1612 and 1613 of this title, such terms shall mean any individual who (1), irrespective of
whether he or she lives on or near a reservation, is a member of a tribe, band, or other organized group of Indians, including those tribes, bands, or groups terminated since 1940 and those recognized now or in the future by the State in which they reside, or who is a descendant, in the first or second degree, of any such member, or (2) is an Eskimo or Aleut or other Alaska Native, or (3) is considered by the Secretary of the Interior to be an Indian for any purpose, or (4) is determined to be an Indian under regulations promulgated by the Secretary.

(d) “Indian tribe” means any Indian tribe, band, nation, or other organized group or community, including any Alaska Native village or group or regional or village corporation as defined in or established pursuant to the Alaska Native Claims Settlement Act (85 Stat. 688) [43 U.S.C. 1601 et seq.], which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians.

INSURANCE

For the purpose of the VFC program, “insurance” is defined as a plan that is:

- Regulated by a State’s Insurance Commissioner and/or
- Subject to the Employee Retirement Income Security Act of 1974 (ERISA). ERISA is a federal law that sets minimum standards for most voluntarily established pension and health plans in private industry to provide protection for individuals in these plans.

MAXIMUM REGIONAL CHARGE

The amount that a VFC-enrolled provider can charge a non-Medicaid Title XIX (19) VFC-eligible child for each vaccine administered (also known as the administration fee or “admin fee”). State Medicaid agencies have the authority to reimburse at a lower level. The Centers for Medicare and Medicaid Services (CMS) has the responsibility of setting and adjusting the maximum regional charges. See Federal Register.

MEDICAID

Federal and state partnership that creates a medical assistance plan for poor and disabled Americans. It is sometimes called Title XIX because it was authorized under Title XIX of the Social Security Act. VFC is part of the larger Medicaid program but has different eligibility criteria than the Medicaid assistance plan for both providers and participants.

MEDICAID-ELIGIBLE CHILD

A child who is eligible for the Medicaid Title XIX (19) Program. For the purposes of the VFC program, the terms “Medicaid-eligible” and “Medicaid-enrolled” are equivalent and refer to children who have Medicaid Title XIX (19) health insurance coverage by a state Medicaid program.

MEDICAID FRAUD AND CONTROL UNIT (MFCU)

Unit responsible for investigating and prosecuting (or referring for prosecution) violations of all applicable state laws pertaining to fraud in the administration of the Medicaid program, including the VFC program. In general MFCUs are located in the Office of the State Attorney General.
OFFICE OF MANAGEMENT & BUDGET (OMB)
Office that assists the President in overseeing the preparation of the federal budget and supervising its administration in Executive Branch agencies. OMB evaluates the effectiveness of agency programs, policies, and procedures.

OFFICE OF THE STATE ATTORNEY GENERAL (OAG)
Office that advises and represents state agencies that protect the rights of state consumers and may also represent other relevant state agencies. The Medicaid Fraud and Control Unit (MFCU) is located within this office in most states. See Medicaid Fraud and Control Unit.

RURAL HEALTH CLINIC (RHC)
An RHC is a clinic located in a Health Professional Shortage Area, a Medically Underserved Area, or a Governor-Designated Shortage Area. RHCs are required to be staffed by physician assistants, nurse practitioners, or certified nurse midwives at least half of the time that the clinic is open.

STATE FUNDS
State-contributed funds used to purchase vaccine for children who are not VFC-eligible or support program operations.

STATE VACCINE-ELIGIBLE CHILD
Child who is eligible to receive vaccine that was purchased with state funds, usually off the federal CDC contract.

UNDERINSURED CHILD
A child who has health insurance, but the coverage does not include vaccines; a child whose insurance covers only selected vaccines (VFC-eligible for non-covered vaccines only). Underinsured children are eligible to receive VFC vaccine only through a Federally Qualified Health Center (FQHC), or Rural Health Clinic (RHC) or under an approved deputization agreement.

UNINSURED CHILD
A child who has no health insurance coverage.

VACCINE FUNDING SOURCE
The three (VFC, 317, and state/local) funding sources to purchase vaccines.

- **VFC funds**: Federal entitlement funds used to purchase vaccines for administration to VFC-eligible children;
- **317 funds**: Federal funds that can be used to purchase vaccine for non-VFC eligible populations;
- **State funds**: State contributed funds, when available, used to purchase vaccines for individuals who are not VFC-eligible.
**VFC ABUSE**

Provider practices that are inconsistent with sound fiscal, business, or medical practices, and that 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 health care. It also includes recipient practices that result in unnecessary cost to the Medicaid program.

**VFC-ELIGIBLE CHILD**

*Also known as federally vaccine-eligible child.* A child who is 18 years of age or younger and meets one or more of the following categories:

i. is an American Indian or Alaska Native; or
ii. is eligible/enrolled in Medicaid Title XIX (19); or
iii. has no health insurance; or
iv. is underinsured and receives vaccine through a FQHC, RHC or deputized local health department.

**VFC FUNDS**

The Office of Management and Budget approves funding for the VFC program. Funding is through the Centers for Medicare and Medicaid Services to the CDC with awards made to 61 eligible awardees. Funding is used to purchase vaccines only for VFC-eligible children and support VFC-related activities, such as vaccine ordering and VFC and AFIX site visits.