

## Report on Medicare Compliance Volume 30, Number 11. March 22, 2021

### CMS: No MSP Waiver for COVID-19 Vaccines, But There's a Shortcut; CMS Increases Payment

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By Nina Youngstrom

Although it may slow the process of putting COVID-19 shots in arms, hospitals are required to complete the Medicare as Secondary Payer (MSP) questionnaire or a version of it when administering the vaccine. There's no waiver for finding out whether Medicare is the primary payer, a CMS spokesperson said, although CMS two years ago provided a shortcut.

"The MSP questions must be asked during the vaccine process," a CMS spokesperson told RMC.

That presents a challenge for hospitals as they try to meet vaccination demands, especially if they use volunteers in their vaccination clinics, said a compliance officer who prefers not to be identified. "This is a large burden, as we are trying to get people vaccinated quickly," she noted.

The MSP questionnaire is used to determine whether Medicare is the primary or secondary payer. If another insurer is primary, it pays the lion's share of the patient's bill, and Medicare covers the rest. Hospitals and other providers are required to ask Medicare patients the questions about their insurance coverage or at least to ascertain whether their insurance has changed.

The compliance officer had hoped for a waiver of the MSP questionnaire requirement because hospitals are vaccinating a tidal wave of patients, and "it is much too time-consuming to do this," she said. "We also have volunteers assisting our normal staff with carrying out these vaccines. It would take significant time to train volunteers to complete the MSP questionnaire. We really would want the process to be as simple as possible. On top of that, Medicare is paying for the vaccines of patients who have Medicare Advantage. Normally we do not have to complete the questionnaire for Medicare Advantage patients, but now we really should."

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