



Robert Moser, MD, Secretary

Department of Health & Environment

Sam Brownback, Governor

TO: Kansas VFC Providers  
Kansas Academy of Pediatrics  
Kansas Academy of Family Practice,  
KAMU  
KALHD  
KDHE Office of Local Public Health  
KDHE Office of Primary Care

cc: Robert Moser, M.D, Secretary  
Brenda Walker, Director, Bureau Disease Control and Prevention

FROM: Ryan Burns, Kansas Immunization Program Director

SUBJECT: Federal 317 Vaccine and Fully Insured Persons

DATE: August 15, 2012

The Kansas Immunization Program (KIP) has offered enrolled Vaccine for Children (VFC) providers' access to federally purchased and state funded vaccines for eligible children from birth through 18 years of age along with limited adult vaccine since 1994. Federally purchased vaccines are funded by the VFC program and congressional discretionary 317 funds.

VFC vaccines may only be used for children who are:

- Medicaid enrolled or eligible
- Uninsured
- American Indian/Alaskan Native
- Underinsured\*, if vaccinated at a Federally Qualified Health Center (FQHC) or Rural Health Clinic (RHC) or under an approved deputized Local Health Department

317 vaccines are used to fill in the gaps in the national immunization program and therefore, have restrictions on which persons they may be administered to. Kansas has worked with our VFC providers for over 10 years to help assure fully insured persons are not immunized with 317 funded vaccines. Kansas VFC Providers have been, and are, diligent in determining eligibility for VFC vaccines.

The CDC is requiring increased accountability for all immunization program grantees and enrolled VFC providers who use federally purchased vaccines therefore; we are sharing the CDC's communication with you and your organization as follows:

*Beginning October 1, 2012, Section 317 vaccine may not be used for routine vaccination of any fully-insured individual. The CDC defines fully-insured as:*

**Anyone with insurance that covers the cost of vaccine, even if the insurance includes a high deductible or co-pay, of 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.**

*Section 317 vaccines are a critical resource for filling gaps in the nation's immunization program. It is important that Section 317 vaccine be directed to those with the least ability to pay for vaccination and to assure timely response to outbreaks of vaccine-preventable diseases. In order to assure that 317 vaccines remains available for those who truly have no other option, it is important that all fully insured children are vaccinated with vaccines purchased through their insurance. We want to assure you that the Vaccines for Children (VFC) program will continue to serve eligible children and adolescents.*

*This 317 policy clarification, which specifies that Section 317 vaccines should not be used for routine vaccination of fully insured children, adolescents and adults, affects both the public and private sectors. Private physicians who have been referring their patients to public health clinics for routine vaccination may need to consider how to meet the preventive care needs of their fully insured patients. Similarly, insurance providers will need to ensure adequate in-network providers to vaccinate all of the individuals covered under their plans. The Section 317 Immunization Program has contributed to one of the most successful public health interventions in history. It is essential that we collectively provide responsible stewardship of this precious national resource by ensuring Section 317 vaccine is directed to those most at need.*

The Kansas Immunization Program (KIP) has been directed by the CDC to develop a policy for use of 317 funded vaccines for Kansas VFC providers. This policy reiterates what each of the enrolled VFC providers in Kansas have been doing for years. If your clinic or facility is directly impacted by this change, you will receive a separate communication from our program in the next few weeks. A frequently asked question document is attached which will help explain these reminders in more detail.

It is important to note that Kansas providers have been good stewards of 317 vaccine resources over the years and KIP is confident this will not change.

Questions about this policy and program may be directed to:

Martha Froetschner, RN, Assistant Program Director, Kansas Immunization Program at: [mfroetschner@kdheks.gov](mailto:mfroetschner@kdheks.gov) or 785-925-1990.

Thank you for your commitment to keep Kansans safe from vaccine-preventable disease.

#### Attachments

*\*Underinsured: A person who has health insurance, but the coverage does not include vaccines or a person whose insurance covers only selected vaccines or whose insurance caps vaccine coverage at a certain dollar amount. Children who are underinsured for selected vaccines or who has exceeded their capped amount are VFC-eligible for non-covered vaccines only at a Federally Qualified Health Center (FQH) or Rural Health Clinics (RHC) or under an approved deputization agreement.*