The Centers for Medicare & Medicaid Services (CMS) invites eligible Medicaid managed care organizations (MCOs) to participate in a data-sharing pilot project to facilitate increased care coordination for individuals dually eligible for Medicare and Medicaid, also known as "dually eligible beneficiaries," during the COVID-19 public health emergency. This pilot project (herein referred to as the "Medicare COVID-19 Vaccination Data for Medicaid MCOs pilot") will be managed by CMS' Medicare-Medicaid Coordination Office (MMCO), and is open to a maximum of 20 Medicaid MCOs that enroll dually eligible beneficiaries.

Medicaid MCOs serving dually eligible beneficiaries encounter additional complexity in coordinating care during the COVID-19 pandemic due to the lack of access to Medicare vaccination-related claims data. Medicare is the primary payer for COVID-19 vaccine administration for dually eligible beneficiaries. When a dually eligible beneficiary receives a COVID-19 vaccine and the health care provider bills Medicare for the vaccine administration, the claim is 100% paid by Medicare; the Medicaid MCO may have no knowledge of the claim.

Through the Medicare COVID-19 Vaccination Data for Medicaid MCOs pilot, Medicaid MCOs selected for the pilot will have the opportunity to request to receive certain Medicare COVID-19 vaccination claims data[1] on a weekly basis from CMS regarding their dually eligible beneficiaries. Medicaid MCOs will access vaccination claims data using CMS' Additional Beneficiary Information Initiatives (ABII) portal.[2] CMS may approve the request and provide the data if requested for the Medicaid MCOs' health care operations such as case management, care coordination, or population-based activities to improve the health of dually eligible beneficiaries, and that data is the minimum necessary for such purposes. The objective of this pilot is to help Medicaid MCOs that provide comprehensive services to identify high-risk dually eligible beneficiaries in need of a COVID-19 vaccine, support equitable vaccinations, and coordinate outreach to beneficiaries, engage beneficiaries in vaccination-related services and supports, and improve care coordination across comprehensive benefits coverage.

The pilot will last approximately six months. Once the pilot is complete, CMS will assess the feasibility and value of making this COVID-19 vaccination data on dually eligible beneficiaries available for request by Medicaid MCOs nationwide.

Eligibility Requirements
To be eligible for the Medicare COVID-19 Vaccination Data for Medicaid MCOs pilot, the applicant must:
- Be a Medicaid MCO, as defined in 42 CFR § 438.2.
- Enroll dually eligible beneficiaries as of August 1, 2021.
- Have a dedicated point of contact to interface with CMS' data sharing team.

---

[1] This data, provided as an Excel file, will include information needed for the Medicaid MCO to identify the dually eligible beneficiary (name, Medicare Beneficiary Identifier, date of birth) and vaccine-specific information (date the vaccine was administered, the identifier for the administering health care provider, the National Drug Code for the vaccine given). Other information, such as whether a first or second dose was administered, a code indicating where the patient resides (private home, long-term care facility, or other location) and the site where the vaccine was administered, if that information appeared on the pharmacy claim, is also included. The Medicaid MCO will access this data via the ABII-COVAX data system, hosted by CMS contractor Acumen, LLC.
[2] Refer to https://www.cms.gov/files/document/covid-access-covid-19-vaccine-data-parts-c-d-enrollees.pdf

How to Apply

- Submit a narrative to MMCODataSharing@cms.hhs.gov describing how the Medicaid MCO would use the data for health care operations purposes such as care coordination, case management, and population-based activities to improve health, for its dually eligible beneficiaries. The narrative should be no more than two pages using 12-point font. The narrative should include:
    - A brief overview of the Medicaid MCO, including:
        - The type of Medicaid MCO plan;[3]
        - The geographic area it serves;
        - The number of dually eligible beneficiaries enrolled in the Medicaid MCO as of August 1, 2021; and
        - The extent to which dually eligible beneficiaries are enrolled in an aligned Medicare Advantage (MA) product, an unaligned MA plan, and/or Medicare Fee-For-Service.
    - If applicable, whether the Medicaid MCO or its parent organization currently requests Medicare COVID-19 vaccination data for its Medicare product(s) and how it utilizes the data.[4]
    - How the Medicaid MCO would utilize the data for its health care operations activities, as defined under the first and/or second paragraph of the definition of "health care operations" in the HIPAA Privacy Rule at 45 C.F.R. § 164.501, including care coordination activities that improve equity in COVID-19 vaccination.
    - A description of how the data requested is the minimum necessary for the intended purpose(s).

Selection Criteria

A team from CMS will review the applications to assess the eligibility of the applicant, as well as the degree of responsiveness and clarity in the proposal. CMS will evaluate applicants based on:

- Diversity of award recipients in regards to:
    - Geography, and
    - Number of dually eligible beneficiaries enrolled.
- Type of Medicaid MCO plan:
    - At least three Medicaid MCOs whose parent organizations operate nationwide and three MCOs that do not; and
    - At least three Medicaid MCOs whose parent organizations currently receive Medicare COVID-19 vaccination data for their Medicare product(s), and three Medicaid MCOs whose parent organizations do not.
- The quality of the intended care coordination and other health care operations activities to improve equity in COVID-19 vaccination.
- The completeness of the project narrative in terms of satisfying the content requirements listed above.

---

[3] For more information about Medicaid Managed Care, see here [https://www.medicaid.gov/medicaid/managed-care/index.html.](https://www.medicaid.gov/medicaid/managed-care/index.html)

[4] CMS currently has a process for Medicare Advantage (MA) Plans (including Local Coordinated Care Plans (CCPs), and Regional CCPs as well as other plan types), Prescription Drug Plans (PDPs) and Medicare-Medicaid Plans (MMPs) to request COVID-19 vaccination data for Medicare beneficiaries. See [here](#) for more information.

CMS will notify all applicants regarding selection status for participation in the pilot via email.

Requirements of Participation
- The Medicaid MCO must attest that it meets certain HIPAA requirements for receiving the data, including that the plan is a HIPAA covered entity as defined in 45 CFR § 160.103.
- Sign and maintain a CMS Data Use Agreement (DUA), CMS-R-0235, and accompanying Medicare COVID-19 Vaccination Data for Medicaid MCOs pilot DUA Attachment 1.
    - The DUA Retention Date will be 12 months after the end of the COVID-19 public health emergency.
- Maintain 1-2 user accounts for accessing the ABII-COVAX data system, hosted by CMS contractor Acumen, LLC.

Additionally, CMS may follow up with participating Medicaid MCOs to discuss their experiences accessing and using the Medicare data through this pilot, and to discuss process improvements.

We encourage you to consider becoming part of this unique data sharing opportunity! **The deadline to apply is August 30, 2021.**