

Dosage-based Assessment Refund Policy

Background:

The Washington Vaccine Association (WVA) Assessment Grid lists the dosage-based assessments (DBA) for vaccines included in the state's Childhood Vaccine Program. The WVA Board approved an update to the current Assessment Grid dated 2/1/2012 at its November 2011 meeting. The updated grid reduces vaccine assessment levels for dates of service on or after 2/1/2012. Notice of the update was sent to providers on December 1, 2011, shared with the WVA board, and posted prominently on the WVA website. The issue presented is whether the WVA would issue refunds to health carriers and Third Party Administrators upon request, in cases where payers had failed to change their systems to pay at the new, reduced amounts. A limited number of refunds are performed in the normal course of WVA operations for reasons related to patient eligibility or billing/payment errors.

Purpose:

The purpose of this policy is to clarify that the WVA will not issue refunds for payments made at assessment levels in effect before 2/1/2012. A prior board policy, adopted in May 2011, was a "one-time" policy that addressed only the reduction in assessments effective on 6/1/2011. This new policy states that going forward, payers are accountable for paying at the appropriate rate set out in the WVA Assessment Grid in effect at the time they make the DBA payment.

Policy:

The WVA will not issue refunds to health carriers or TPAs for overpayments resulting from failing to apply the most recent assessment levels published in the WVA Assessment Grid on the WVA website. This policy is conditioned on providing a 60-day notice to payers and providers prior to implementing new assessment rates so the new rates can be loaded into payer systems and operationalized.

Rationale and Support:

- Providers and payers have adequate notice of updates to vaccine assessment levels and effective dates through several channels, including a Department of Health blast fax and WVA email alert as well as an announcement on the WVA home page.
- Currently resources are not allocated to the operational work to refund specific payer's overpayments.
- This policy has been discussed by the WVA staff and was approved by the WVA Operations team on 5/10/2012