

**MEDICAID POLICY INFORMATION SHEET**

**Policy Analyst:** Adriena Krul-Hall

**Phone Number:** 517-284-1221

Initial

Public Comment

Final

**Brief description of policy:**

To support widespread COVID-19 testing, Medicaid will temporarily reimburse COVID-19 specimen collection when performed by Tribal Health Centers (THCs) and Tribal Federally Qualified Health Centers (FQHCs). In addition, the policy clarifies COVID-19 specimen collection services allowable under MSA 20-57 are not eligible for Medicaid reimbursement if they are provided under another Federal or State of Michigan program or contract.

**Reason for policy (problem being addressed):**

Widespread COVID-19 laboratory testing requires significant provider resources to safely collect specimens from many beneficiaries during a pandemic. Reimbursement mechanisms are needed to provide payment for COVID-19 specimen collection services performed in tribal clinics when an eligible qualifying clinic visit is not provided. In addition, billing clarification was needed to prevent dual State and/or Federal reimbursement for specimen collection services.

**Budget implication:**

budget neutral

will cost MDHHS \$ 3,000 for FY20, and is not budgeted in current appropriation

will save MDHHS \$

**Is this policy change mandated per federal requirements?**

No

**Does policy have operational implications on other parts of MDHHS?**

Yes, changes will require assistance from the Claims Unit.

**Does policy have operational implications on other departments?**

No.

**Summary of input:**

controversial

acceptable to most/all groups

limited public interest/comment

**Supporting Documentation:**

State Plan Amendment Required: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Public Notice Required: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If Yes, please provide status:	If yes, Submission Date:
<input type="checkbox"/> Approved <input checked="" type="checkbox"/> Pending <input type="checkbox"/> Denied	
Date: Approval	Date:

**DRAFT FOR PUBLIC COMMENT**

**Michigan Department of Health and Human Services**

**Project Number:** 2072-Lab

**Date:** December 4, 2020

**Comments Due:** January 8, 2021

**Proposed Effective Date:** March 10, 2020

**Direct Comments To:** Adriena Krul-Hall

**Address:**

**E-Mail Address:** [Krulhalla@michigan.gov](mailto:Krulhalla@michigan.gov)

**Phone:**

**Fax:**

**Policy Subject:** COVID-19 Response: Tribal Health Centers and Tribal Federally Qualified Health Center COVID-19 Specimen Collection; Clarification to MSA 20-57: COVID-19 Specimen Collection

**Affected Programs:** Medicaid, Healthy Michigan Plan, Children’s Special Health Care Services, Maternity Outpatient Medical Services

**Distribution:** Practitioners, Outpatient Hospitals, Local Health Departments, Federally Qualified Health Centers, Independent Diagnostic Laboratories, Medicaid Health Plans, Pharmacies, Rural Health Clinics, Tribal Health Centers, and Tribal Federally Qualified Health Centers

**Summary:** Recognizing the critical importance of expanding widespread COVID–19 testing and the significant resources involved in safely collecting specimens from many beneficiaries during a pandemic, Medicaid will temporarily reimburse COVID-19 specimen collection services performed by Tribal Health Centers (THCs) and Tribal Federally Qualified Health Centers (FQHCs). In addition, the policy clarifies COVID-19 specimen collection services allowable under MSA 20-57 are not eligible for Medicaid reimbursement if they are provided under another Federal or State of Michigan program or contract.

**Purpose:** To increase and facilitate widespread COVID–19 laboratory testing and to provide billing clarification to prevent dual State and/or Federal reimbursement.

**Cost Implications:** GF Cost: \$3,000/Fed Cost: \$5,000.

Services provided to American Indians and Alaskan Natives at Tribal 638 facilities are 100% federally matched. The \$5,000 impact represents the federal share for services provided to natives. Tribal 638 facilities also treat non-natives, which explains the \$3,000 general fund impact to the state.

**Potential Hearings & Appeal Issues:** Aware of None

**State Plan Amendment Required:** Yes  No   
**If yes, date submitted:**

**Public Notice Required:** Yes  No   
**Submitted date:**

**Tribal Notification:** Yes  No  - **Date:** November 2, 2020

**THIS SECTION COMPLETED BY RECEIVER**

**Approved**

**No Comments**

**Disapproved**

**See Comments Below**

**See Comments in Text**

**Signature:**

**Phone Number**

**Signature Printed:**

**Bureau/Administration** *(please print)*

**Date**

Comment001

Revised 6/16

**Bulletin Number:** MSA 20-74

**Distribution:** Practitioners, Outpatient Hospitals, Local Health Departments, Federally Qualified Health Centers, Rural Health Clinics, Independent Diagnostic Laboratories, Medicaid Health Plans, Pharmacies, Tribal Health Centers, and Tribal Federally Qualified Health Centers

**Issued:** December 4, 2020

**Subject:** COVID-19 Response: Tribal Health Centers and Tribal Federally Qualified Health Centers COVID-19 Specimen Collection; Clarification to MSA 20-57: COVID-19 Specimen Collection

**Effective:** March 10, 2020

**Programs Affected:** Medicaid, Healthy Michigan Plan, Children's Special Health Care Services, Maternity Outpatient Medical Services

### **Tribal Health Centers and Tribal Federally Qualified Health Centers COVID-19 Specimen Collection**

Per Centers for Disease Control and Prevention (CDC) and State recommendations, widespread diagnostic testing for COVID-19 is a critical component of a public pandemic response to support infection control and proper treatment. Recognizing the critical importance of expanding this testing and the significant resources involved in safely collecting specimens from many beneficiaries during a pandemic, Medicaid will temporarily reimburse COVID-19 specimen collection services performed by Tribal Health Centers (THC) and Tribal Federally Qualified Health Centers (FQHC).

Consistent with public health emergency conditions at both the state and federal levels related to COVID-19, the Michigan Department of Health and Human Services (MDHHS) is issuing this policy effective March 10, 2020. Given the circumstances, this policy is intended to be time-limited, and MDHHS will notify providers of its termination.

THCs and Tribal FQHCs may bill for COVID-19 collection services for dates of service on or after March 10, 2020 when no other eligible qualifying clinic visit is provided on the same date of service. Services will be excluded from the All-Inclusive Rate reimbursement methodology and reimbursed at a fee screen pursuant to the practitioner payment methodology.

Providers may be reimbursed for COVID-19 specimen collection services using procedure code 99000 (handling and conveyance of specimen for transfer from office to lab) or 99001 (handling and conveyance of specimen for transfer from patient in other than an office to lab) as appropriate. To be eligible for payment, CPT codes 99000 and 99001 must be reported on the institutional claim format with one of the following ICD-10-CM diagnoses:

- Z03.818 - Encounter for observation for suspected exposure to other biological agents ruled out (*use for possible exposure to COVID-19*)
- Z11.59 - Encounter for screening for other viral diseases (*use for asymptomatic beneficiaries*)
- Z20.828 - Contact with and (suspected) exposure to other viral communicable diseases (*use for confirmed exposure to COVID-19*)

All identifiable financial resources must be utilized for COVID-19 specimen collection services provided to Medicaid beneficiaries prior to the use of Medicaid funds. A provider will not be eligible for Medicaid reimbursement if COVID-19 specimen collection services were provided under another Federal or State of Michigan program or contract.

Any COVID-19 specimen collected shall be tested at a laboratory or entity in accordance with federal Clinical Laboratory Improvement Amendments (CLIA) regulations. Proper training for collecting the sample and adherence to the testing device manufacturer's instructions and CDC specimen collection procedures is required. All beneficiaries should be notified of their test results in a timely manner that maintains patient privacy in accordance with state and federal laws and regulations. Providers must comply with any COVID-19 reporting requirements issued by MDHHS.

This policy supplements existing laboratory services policy. All current laboratory ordering and documentation requirements, standards of care, and limitations remain in effect regardless of whether the service is related to COVID-19 testing.

### **MSA 20-57 COVID-19 Specimen Collection Clarification**

This policy supplements Bulletin MSA 20-57, issued August 11, 2020, and clarifies the billing requirements for COVID-19 specimen collection performed by practitioners, federally qualified health centers (FQHCs) and rural health clinics (RHCs), outpatient hospitals, independent diagnostic laboratories, and pharmacists.

All identifiable financial resources must be utilized for COVID-19 specimen collection services provided to Medicaid beneficiaries prior to the use of Medicaid funds. A provider will not be eligible for Medicaid reimbursement if COVID-19 specimen collection services were provided under another Federal or State of Michigan program or contract.

## Public Comment

The public comment portion of the policy promulgation process is being conducted concurrently with the implementation of the change noted in this bulletin. Any interested party wishing to comment on the change may do so by submitting comments to Adriena Krul-Hall via e-mail at [KrulHallA@michigan.gov](mailto:KrulHallA@michigan.gov).

Please include "COVID-19 Response: Tribal Health Centers and Tribal Federally Qualified Health Centers COVID-19 Specimen Collection; Clarification to MSA 20-57: COVID-19 Specimen Collection" in the subject line.

Comments received will be considered for revisions to the change implemented by this bulletin.

## Manual Maintenance

Information is time-limited and will not be incorporated into any policy or procedure manuals.

## Questions

Any questions regarding this bulletin should be directed to Provider Inquiry, Department of Health and Human Services, P.O. Box 30731, Lansing, Michigan 48909-8231, or e-mailed to [ProviderSupport@michigan.gov](mailto:ProviderSupport@michigan.gov). When you submit questions, be sure to include your name, affiliation, NPI number, and phone number so you may be contacted if necessary. Providers may phone toll-free 1-800-292-2550.

## Approved

A handwritten signature in black ink, appearing to read 'K. Massey', with a long horizontal flourish extending to the right.

Kate Massey, Director  
Medical Services Administration