

MEDICAID POLICY INFORMATION SHEET

Policy Analyst: Margo Sharp

Phone Number: 517-284-1222

Initial

Public Comment

Final

Brief description of policy:

This policy will allow coverage of the administration of Emergency Use Authorization (EUA) monoclonal antibody COVID-19 treatment by authorized Advanced Life Support Emergency Medical Services (EMS) providers to state defined eligible beneficiaries.

Reason for policy (problem being addressed):

EUA mAb COVID-19 infusion treatments are for people who have tested positive for COVID-19 and have mild to moderate symptoms. Due to the limited number of available infusion sites, ALS agencies may provide EUA mAb COVID-19 infusions at the beneficiary's location.

Budget implication:

budget neutral

will cost MDHHS \$ 450,000 (FY21 & FY22), 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. The MDHHS Bureau of EMS, Trauma & Preparedness (BETP) oversees ambulance licensing and the protocols for administration of mAb COVID-19 infusion treatments.

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: 2124-EMS

Date: May 4, 2021

Comments Due: June 8, 2021

Proposed Effective Date: January 1, 2021

Direct Comments To: Margo Sharp

Address:

E-Mail Address: Sharpm1@michigan.gov

Phone:

Fax:

Policy Subject: COVID-19 Response: Coverage of U.S. Food & Drug Administration (FDA) Emergency Use Authorization (EUA) Monoclonal Antibody COVID-19 Infusions by Emergency Medical Services (EMS) Providers

Affected Programs: Medicaid, Healthy Michigan Plan, MIChild, Emergency Services Only (ESO), Maternity Outpatient Medical Services (MOMS)

Distribution: Ambulance Providers, Hospitals, Practitioners, Federally Qualified Health Centers, Home Health Providers, Local Health Departments, Nursing Facilities, Pharmacies, Rural Health Clinics, Tribal Health Centers

Summary: This policy will allow coverage of the administration of EUA monoclonal antibody COVID-19 treatment by authorized Advanced Life Support EMS providers to state defined eligible beneficiaries.

Purpose: EUA mAb COVID-19 infusion treatments are for people who have tested positive for COVID-19 and have mild to moderate symptoms. Due to the limited number of available infusion sites, ALS agencies may provide EUA mAb COVID-19 infusions at the beneficiary's location.

Cost Implications: FY21: \$900,000 gross - \$675,000 federal, \$225,000 state
FY22: \$900,000 gross - \$675,000 federal, \$225,000 state

Potential Hearings & Appeal Issues: None

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

Public Notice Required: Yes No
Submitted date:

Tribal Notification: Yes No - Date:

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 21-17

Distribution: Ambulance Providers, Hospitals, Practitioners, Federally Qualified Health Centers, Home Health Providers, Local Health Departments, Nursing Facilities, Pharmacies, Rural Health Clinics, Tribal Health Centers

Issued: May 4, 2021

Subject: COVID-19 Response: Coverage of U.S. Food & Drug Administration (FDA) Emergency Use Authorization (EUA) Monoclonal Antibody COVID-19 Infusions by Emergency Medical Services (EMS) Providers

Effective: January 1, 2021

Programs Affected: Medicaid, Healthy Michigan Plan, MICHild, Emergency Services Only (ESO), Maternity Outpatient Medical Services (MOMS)

NOTE: Implementation of this policy is contingent upon State Plan Amendment (SPA) approval from the Centers for Medicare & Medicaid Services (CMS).

To assist with providing timely access to available treatments for COVID-19, the Michigan Department of Health and Human Services (MDHHS) will provide reimbursement to Advanced Life Support (ALS) EMS agencies for the administration of EUA monoclonal antibody (mAb) COVID-19 infusions for beneficiaries meeting certain criteria. This bulletin provides information regarding Medicaid program coverage and reimbursement of EUA mAb COVID-19 infusions provided by EMS providers for dates of service on and after January 1, 2021.

EUA mAb COVID-19 infusion treatments are for people who have tested positive for COVID-19 and have mild to moderate symptoms. Due to the limited number of available infusion sites, ALS agencies may provide EUA mAb COVID-19 infusions at the beneficiary's location.

Additional information about MDHHS' Medicaid coverage of the FDA's EUA drugs, devices and biological products for COVID-19 prevention and treatment can be found in bulletin [MSA 20-81](#).

Beneficiary Qualifications

The MDHHS Bureau of EMS, Trauma & Preparedness (BETP) protocols outline criteria identifying individuals appropriate for the EUA mAb COVID-19 infusion services. Services must be prescribed by a Medicaid enrolled provider or other Medicaid enrolled authorized prescriber consistent with current Medicaid policy.

Details of BETP Protocol 14.13 are subject to change and available on the [MDHHS website](#).

Provider Qualifications

EMS providers may be reimbursed for the EUA mAb COVID-19 infusion administration if they are:

- Licensed as Advanced Life Support under MCL 333.20920;
- Operating under an approved protocol (emergency or otherwise) established according to MCL 333.20919; and
- Enrolled with CMS as a provider of monoclonal antibody therapy.

Reimbursement for Administration of EUA mAb COVID-19 Infusions

For the duration of the federally declared COVID-19 Public Health Emergency (PHE), Medicaid will cover FDA EUA mAb COVID-19 infusions and their administration for COVID-19 treatment. The effective date and coverage parameters will be consistent with their respective FDA EUA status provisions.

During the PHE, when EUA mAb COVID-19 infusion drugs for COVID-19 treatment are procured and purchased by the federal government, they will be made available to EMS providers at no cost. Medicaid will not reimburse providers for EUA mAb COVID-19 infusion drugs that are federally purchased or supplied for free. Providers may bill the procedure code and the cost of the EUA mAb COVID-19 infusion drugs as \$0.00. During the federally declared PHE period, including any extensions, reimbursement for the administration services of the EUA mAb COVID-19 infusion will be temporarily increased to 100% of Medicare rates for equivalent services.

Providers must use appropriate Healthcare Common Procedure Coding System (HCPCS) codes for the EUA mAb COVID-19 infusion administration when submitting a claim for reimbursement. MDHHS covered HCPCS codes and associated rates can be found on the [COVID-19 Response](#) and [Ambulance](#) databases. Consistent with [MSA 20-40](#), EUA mAb COVID-19 infusion administration is covered for ESO beneficiaries. Billing guidance in MSA 20-40 must be followed to ensure accurate claims adjudication.

Medicaid will not reimburse providers for mileage to or from the beneficiary's location to administer the EUA mAb COVID-19 infusion.

All other program criteria must be met for payment to be made.

Medicaid Health Plan (MHP) Carve Out

EMS administration of EUA mAb COVID-19 infusions are carved-out from MHP coverage. Providers must submit claims for Fee-for-Service and MHP beneficiaries to the Community Health Automated Medicaid Processing System (CHAMPS).

MI Health Link Integrated Care Organization (ICO) Carve Out

EMS administration of EUA mAb COVID-19 infusions are carved-out from ICO coverage. Providers must submit claims to Original Medicare through their Medicare Administrative Contractor (MAC).

Additional Resources for EMS Providers

Information on Monoclonal Antibody COVID-19 Infusion can be found at:
<https://www.cms.gov/medicare/covid-19/monoclonal-antibody-covid-19-infusion>.

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 Margo Sharp via e-mail at Sharpm1@michigan.gov.

Please include "COVID-19 Response: Coverage of U.S. Food & Drug Administration (FDA) Emergency Use Authorization (EUA) Monoclonal Antibody COVID-19 Infusions by Emergency Medical Services (EMS) Providers" 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. When you submit questions, be sure to include your name, affiliation, NPI number, and phone number so you may be contacted if necessary. Typical Providers may phone toll-free 800-292-2550. Atypical Providers may phone toll-free 800-979-4662.

An electronic copy of this document is available at www.michigan.gov/medicaidproviders >> Policy, Letters & Forms.

Approved



Kate Massey, Director
Medical Services Administration