



Stakeholder Update: COVID 19

Medicaid and CHIP Services

April 2, 2020



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COVID-19 Response

Where we are:

- Rapidly changing situation
- Response is iterative
- Review what's implemented to date

Communication Channels

Clients

- [COVID section on HHS site](#)
- Health plan channels and providers

Providers

- [COVID section on HHS site](#)
- [COVID section on TMHP site](#)
- Health plan channels

+ Weekly calls

Submit questions to:

Medicaid_COVID_Questions@hhsc.state.tx.us



Requests for Federal Flexibility

- States have several avenues to request flexibility during a disaster to ensure client access and to ease administrative burdens for providers, such as:
 - 1135 waiver
 - 1115 waiver
 - 1915(c) waiver Appendix K
 - State plan amendment
- Texas submitted the initial Medicaid 1135 waiver request on March 25, 2020 and received partial federal approval on March 30, 2020.





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Medicaid 1135 Request

HHSC continues to discuss the following flexibilities with CMS:

- Extend to 60 days the amount of time that MCOs have to resolve standard appeals statewide.
- Waive the requirements that a member appealing to an MCO must have their oral request for an appeal be confirmed in writing.
- Authorize the state to extend all deadlines that require a person to request continuation of benefits from 10 days to 30 days.
- Waive any requirements of the state plan that require face-to-face contacts to allow the services to be performed by telehealth, telemedicine, or telephonic contact as consistent with state law and subject to HHSC requirements.
- Extend current medical necessity, service authorizations, and level of care authorizations for state plan fee-for-service and managed care services and programs, including waiver programs.
- Extend or allow the state to waive any requirements that require the signature of physician or DME provider or Medicaid recipient.
- Allow Texas Medicaid to reimburse pharmacies for the administration of flu vaccines, long acting antipsychotics, and drugs used to treat substance use disorder or opioid dependency.
- Waive timeframes associated with public notice requirements for an 1115 waiver.



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1135 Request Approvals

Long Term Services and Supports:

- Suspend pre-admission screening and annual resident review (PASRR) Level I and Level II Assessments for 30 days.
- Extend minimum data set authorizations for nursing facility and skilled nursing facility (SNF) residents.



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1135 Request Approvals

Fair Hearings:

- Extend the amount of time an enrollee has to request a state fair hearing by 30 days.

Other Approvals:

- Waive the timeframes associated with the public notice requirements for state plan amendments.
- Modify deadlines for OASIS and Minimum Data Set (MDS) assessments and transmission.



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1135 Request Approvals

Medicaid Authorizations:

- Extend prior authorizations (PA) for services expiring.
- How HHSC will implement:
 - Managed care and fee-for-service prior authorizations requiring recertification and expiring from March 13 – April 30, 2020 will be extended for 90 days.
 - Extended authorizations must contain the same proportional amount and frequency as was originally authorized.
 - Does not apply to current authorizations for one-time services or pharmacy PAs.
 - A provider may submit an amended request to an existing, extended PA.
 - Before reimbursement is requested, providers must have obtained the appropriate required documentation.

1135 Request Approvals

Provider Revalidation/Enrollment:

- Postpone deadlines for provider revalidation for providers who are located in the state or otherwise directly impacted by the emergency.
- Waive certain requirements to expedite providers' ability to enroll in Texas Medicaid:
 - Application fee
 - Fingerprint-based criminal background checks
 - Site visits
 - In-state license requirement as long as provider is licensed in another state
 - Medicare enrollment requirements



COVID-19 Provider Applications

- How HHSC will implement:
 - Temporary expedited enrollment is valid during dates of the current federally-approved public health emergency.
 - All provider types that currently enroll into Texas Medicaid and CHIP using TMHP's systems will enroll through the expedited process (<http://www.tmhp.com/Pages/COVID-19/COVID-19-HOME.aspx>).
 - Pharmacies enrolling through the vendor drug program may use the temporary pharmacy agreement (<https://www.txvendordrug.com/providers/enrollment-forms>).
 - At the end of the COVID-19 public health emergency:
 - Temporarily enrolled providers will be identified and contacted.
 - Providers who do not wish to remain enrolled in Texas Medicaid or CHIP will be disenrolled.
 - Providers who wish to remain enrolled must complete all required state and federal screening requirements.



COVID-19 Medicaid Policy Updates

Rural Health Clinics (RHCs) as distant site providers:

- RHCs can be reimbursed as telemedicine and telehealth distant site providers through April 30, 2020.
- RHCs must bill using procedure code T1015 with the modifier 95 to indicate use of the telehealth or telemedicine modality.



COVID-19 Medicaid Policy Updates

Guidance on THSteps Check-ups:

- Medical and dental providers are encouraged to adjust their clinical operations based on their professional medical judgment and guidance from their professional medical and dental societies
- Adjustments may include:
 - Temporarily postponing certain check-ups.
 - Limiting check-ups to certain times of the day.
 - Dedicating specific rooms for sick visits and well visits.
 - Prioritizing visits for younger children, especially those due for routine vaccines.
- Providers are encouraged to continue providing medical exams for children entering Department of Family and Protective Services (DFPS) conservatorship (“3-day exam”) in-person.



DSRIP Flexibility Requests

- HHSC requested and received approval from CMS for flexibilities in April reporting and related payments.
 - Information has been shared with the regional anchors.
- HHSC is also requesting flexibilities around calendar year 2020 measurement.
- Questions can be directed to the DSRIP mailbox:
TXHealthcareTransformation@hhsc.state.tx.us.

