

**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**Department of Health Care Finance**



Office of the Senior Deputy Director-Medicaid Director

**Transmittal # 20-15**

TO: All DC Medicaid Providers

FROM: Melisa Byrd  
Senior Deputy Director and State Medicaid Director

DATE: April 21, 2020

SUBJECT: **Fee-For-Service Prior Authorization and Programmatic changes due to COVID-19**

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The purpose of this transmittal is to notify Medicaid fee-for-service (FFS) providers of temporary Prior Authorization (PA) and other programmatic changes due to the COVID-19 pandemic during the pendency of the federal Public Health Emergency (PHE) period<sup>1</sup>. DHCF requested an 1135 Waiver from the Centers for Medicare and Medicaid Services (CMS) on April 1, 2020. Under section 1135 of the Social Security Act, the HHS Secretary may temporarily waive or modify certain Medicaid, and Children's Health Insurance Program (CHIP) requirements to ensure that sufficient health care items and services are available to meet the needs of individuals enrolled when the President declares a disaster or emergency and the Secretary declares a public health emergency. On April 3, 2020, CMS approved most of the flexibilities requested in the 1135 waiver. This transmittal describes the actions taken by DHCF to implement some of the flexibilities provided in the 1135 Waiver.

To ensure that Medicaid FFS beneficiaries obtain necessary medical services expeditiously, DHCF will implement the following changes:

**Acute Care Hospital Services**

- DHCF has temporarily lifted PA requirements for elective admissions, hospital to hospital transfers, and direct admissions.
- DHCF has added the ICD-10 code for COVID-19 to the list of emergent diagnosis codes. This means that claims for Alliance beneficiaries with this primary diagnosis code should be submitted to DHCF for payment.

**Durable Medical Equipment (DME)**

- For the CMS list of Specified Covered Services, DHCF is waiving the face-to-face requirement.
- Replacement DME requests due to theft can be submitted without a police report, however, a police report should still be filled for theft of DME.

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<sup>1</sup> The Public Health Emergency period, for purposes of the information contained in this Transmittal, is from March 1, 2020, through the termination of the PHE, as determined by the Secretary of the U.S. Department of Health and Human Services, including any extensions.

- Comagine, the District's Quality Improvement Organization (QIO), will refrain from issuing technical denials for issues related to missing information or errors, if there is enough information to generate a prior authorization (PA) with the information on hand.
- Comagine will accept 719As for DME up to one (1) year prior to the date of service.
- Code A4928-Surgical Masks is now a covered benefit on the DC Medicaid fee schedule.

### **Home Health Services (Skilled and Private Duty)**

- DHCF will waive the face-to-face requirement for obtaining or continuing home health service.
- Comagine, the District's QIO, will process home health/private duty requests that are missing a physician-signed plan of care, if the requested hours remain the same or are less than previously approved hours.

### **Nursing Home**

- DHCF is temporarily waiving the PA requirement for Out-of-State (OOS) nursing home placements. If an OOS nursing home chooses to submit a request for an authorization, Comagine, the District's QIO, will issue the authorization.
- All nursing home 6-month and annual reviews will be conducted telephonically and/or electronically. The Comagine nurses should not conduct on-site nursing home reviews. The nursing homes should work collaboratively in ensuring that Comagine staff has access to the facility's Electronic Medical Record (EMR).

### **TEFRA/Katie Beckett**

- For initial applications, Comagine, the District's QIO, must continue to perform a full Level of Care (LOC) review to determine initial eligibility for any over-income families applying for TEFRA/Katie Beckett.
- For renewals, TEFRA/Katie Beckett eligible beneficiaries will be automatically renewed during the COVID-19 Public Health Emergency, but documentation of eligibility is still needed. DHCF's Division of Children's Health Services in the Health Care Delivery Management Administration will work with TEFRA/Katie Beckett families to compile LOC documentation to the extent feasible and submit to Comagine for review. Comagine will be required to process these LOC determinations timely to support ongoing eligibility when the Public Health Emergency ends.

COVID-19 is an emerging and rapidly evolving situation. DHCF is working with our Medicaid providers and stakeholders at all levels and will continue to provide updated information as it becomes available.

### **Contact**

If you have questions, please contact Cavella Bishop, Program Manager, Clinicians, Pharmacy, Acute Provider Services, at [Cavella.Bishop@dc.gov](mailto:Cavella.Bishop@dc.gov) or (202) 724-8936.

**Cc:** DC Hospital Association  
DC Primary Care Association  
DC Health Care Association  
DC Home Health Association  
DC Behavioral Health Association  
DC Coalition of Disability Service Providers  
DC Medical Society