

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



Office of the Senior Deputy Director-Medicaid Director

**Transmittal # 21-07**

TO: District of Columbia Medicaid Providers

FROM: Melisa Byrd  
Senior Deputy Director and State Medicaid Director

DATE: February 23, 2021

SUBJECT: Provider to Beneficiary Education and Counseling for the COVID-19 Vaccine

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**Purpose**

The Department of Health Care Finance (DHCF) is committed to taking critical steps to ensure District residents have access to vaccinations for COVID-19 and are well informed about its benefits. This transmittal provides notice of coverage and reimbursement for COVID-19 vaccine education and outreach in the professional fee schedule and other Medicaid provider reimbursement methodologies.

**Background**

The District is implementing its Vaccination Program based on a three phased approach. For more information on the District's phases and tiers visit <https://coronavirus.dc.gov/vaccine>. As more groups become eligible for vaccination, DHCF wants to ensure providers are proactively providing education and counseling on the benefits of the COVID-19 vaccine for District of Columbia Medicaid beneficiaries. DHCF also wants to ensure providers are aware of reimbursement opportunities for such education and outreach.

DC Health has developed provider toolkits to assist in counseling and educating patients about the benefits and risk of COVID-19 vaccination. The toolkit and other related COVID-19 vaccination materials are available at <https://coronavirus.dc.gov/vaccine>. Additionally, there are a number of COVID-19 vaccination training program materials for healthcare professionals that can be accessed online. These training modules also include modules for specific vaccines and can be accessed at [https://train.org/main/training\\_plan/4870](https://train.org/main/training_plan/4870).

**Reimbursement for Education and Counseling**

DHCF supports good disease management practice and encourages providers to schedule appointments with patients at high risk of illness or death from COVID-19 to conduct COVID-19 vaccine counseling.

As part of a routine primary care or evaluation and management visit (e.g. CPT codes 99201-99205, 99211-99215 as applicable) physicians and other qualified providers can bill for counseling and educating their patients to support medical treatment.

These services can be delivered via telemedicine, under both Medicaid Fee-For-Service (FFS) and Medicaid Managed Care delivery systems with GT modifier for telemedicine visits and place of service code "02" if the beneficiary is receiving services in their home. Medicaid providers

can access more information on Medicaid reimbursement for COVID-19 vaccine administration at <https://dhcf.dc.gov/node/1477761>.

### **Beneficiary Outreach: Federally Qualified Health Centers**

District of Columbia Federally Qualified Health Centers (FQHCs) are reimbursed in accordance with a cost-based [approved Alternative Payment Methodology](#) (APM) that has been [modified](#) in response to the COVID-19 public health emergency. COVID-19 education and counseling are within the scope of services for primary care services and reimbursable under the APM rate for primary care visits.

The costs for certain outreach activities, to the extent they are reasonable, necessary and related to patient care are allowable under the FQHC APM. As clarified in District Rulemaking at 29 DCMR 4510, “Enabling services that support an individual's management of his or her health and social service needs or improve the FQHC's ability to treat the individual, including: Outreach services to identify potential patients and clients and/or facilitate access or referral of potential health center patients to available health center services.”

FQHCs incurring additional costs to outreach to beneficiaries around the COVID-19 vaccine should report those additional costs under the applicable line item their submitted cost report.

### **Beneficiary Outreach: Health Homes**

District *My Health GPS* Health Homes providers are reimbursed via an approved State Plan methodology that has been [modified](#) in response to the COVID-19 public health emergency. Additionally, DHCF reminds enrolled *My Health GPS* Health Homes providers that outreach to beneficiaries to facilitate treatment or discussion of treatment options is a vital part of care coordination, for which providers are reimbursed a per member per quarter (PMPQ) payment. As clarified in District Rulemaking at 29 DCMR 10206.4, “Care Coordination services include, but are not limited to, the following: Providing community-based outreach and follow-up; Providing outreach and follow-up through remote means to beneficiaries who do not require in-person contact.”

*My DC Health Home* Health Homes providers have similar flexibility. As clarified in District rulemaking at 22-A DCMR 2507.1, Care Coordination is the facilitation or implementation of the comprehensive care plan through appropriate linkages, referrals, coordination, and follow-up to needed services and support. Care Coordination is a function shared by the entire Health Home Team and may involve but is not limited to, providing telephonic consults and outreach.

As a part of their care coordination responsibilities, DHCF encourages Health Homes providers to outreach to patients, especially those at high risk of illness or death from COVID-19, to conduct COVID-19 vaccine counseling.

### **Long Term Care Providers**

Long term care providers should continue to engage with District Medicaid beneficiaries in their care with regard to the benefits of the COVID-19 vaccine. DHCF's Long Term Care Administration shares COVID-19 guidance with providers in weekly/monthly meetings and via

Informational Bulletins published to the DHCF website at <https://dhcf.dc.gov/publication/informational-bulletins-ltc-providers>.

Home health providers, long-term care facilities, Adult Day Health Programs (ADHP), and 1915(c) waiver case managers or Service Coordinators interact with Medicaid beneficiaries on a daily basis and are encouraged to continue counseling beneficiaries based on the toolkits and COVID-19 information available on <https://coronavirus.dc.gov/>.

Specifically, DHCF expects case managers providing services for the District's 1915(c) Home and Community-Based Waiver for the Elderly and Persons with Physical Disabilities (EPD) Waiver to include COVID-19 vaccine counseling as part of their ongoing or monthly care coordination activities, for which, case managers are reimbursed a per member per month payment. As set forth in District Rulemaking 29 DCMR 4224.8, "[A] Case Manager shall perform the following ongoing or monthly care coordination activities: Provide information, assistance, and referrals to the beneficiary, where appropriate, related to public benefits and community resources, including other Medicaid services, Medicare, Supplemental Security Income, transit, housing, legal assistance, and energy assistance."

Additionally, ADHP reimbursement under the State Plan and EPD Waiver was modified for the duration of the public health emergency to permit reimbursement equal to seventy-five percent (75%) of the standard per diem rate for wellness checks provided via video conferencing or other electronic modality. A qualifying wellness check includes inquiries/reminders on the overall health status, including emotional well-being, need for care, and any signs or symptoms of illness. As part of ongoing health monitoring and wellness checks or through the delivery of remote or in-person ADHP services, DHCF expects ADHP providers to conduct COVID-19 vaccine counseling.

### **Contact**

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

For providers serving beneficiaries enrolled in Managed Care, please contact your provider relations representatives at the relevant District contracted Managed Care Organization if there are additional questions.