

TO: Enriched Residential Care ARF and RCFE staff, healthcare providers
FROM: L.A. County DHS and DMH Enriched Residential Care Program
DATE: May 28, 2020
RE: Reimbursement for COVID-19 testing and laboratory processing

In the midst of the COVID-19 pandemic, Adult Residential Facility (ARF) and Residential Care Facilities for the Elderly (RCFE) residents and staff may need access to onsite COVID-19 testing. The DMH and DHS Enriched Residential Care team created this guide to help staff and healthcare providers understand the different ways healthcare providers will be paid to conduct onsite testing and do laboratory processing of specimens.

Residents and staff may have many different insurance plans and providers, or no insurance or providers. To maximize patient and provider safety, this DHS+DMH clinical team recommends having as few testers come onsite as possible, to test as many residents and staff at the same time as possible. Testing is free to all facility staff and residents. See below for details.

REMINDER: Facility staff may conduct testing if they are trained, have testing materials, and have PPE (personal protective equipment). For information on how to become trained, facilities can contact their DHS or DMH ERC program manager. Facilities will have to identify a laboratory to process the specimens.

Insurer policies re: COVID-19 testing coverage and payment

Medi-Cal:

Medi-Cal will pay for COVID testing and lab processing. The state Dept. of Health Care Services (which oversees the Medi-Cal program) announced that COVID testing is considered emergency care, and Medi-Cal pays for emergency care. This means that any healthcare provider that conducts testing on Medi-Cal beneficiaries will get paid. Same goes for a lab. If the patient is enrolled in a Medi-Cal health plan, the health plan will pay the provider even if the provider is not part of the plan's network, and even if the plan did not give the provider a prior authorization. If the Medi-Cal beneficiary is in "regular" or "straight" Medi-Cal, not a health plan, then the same rule applies: regular Medi-Cal will pay the claim. See this document for details: "Coverage of Emergency COVID-19 Inpatient or Outpatient Services" <https://www.dhcs.ca.gov/Documents/COVID-19/COVID-19-Emergency-Services.pdf>.

Medicare:

Medicare will pay for COVID testing and lab processing. Medicare announced that it will not require that patients getting tested be "established" (meaning the provider can test patients they have never seen before) and providers can test in alternate locations like an assisted living facility. Providers do not need a physician order to conduct testing. See here for more details: "CMS ACTIONS TO EXPAND SARS-CoV-2 TESTING" <https://www.cms.gov/files/document/43020-sars-cov-2-infographic.pdf>.

Medi-Medi:

For people who have both Medicare and Medi-Cal, sometimes called Medi-Medi or dual eligible, Medicare is the “primary” payer for these testing services, so the Medicare rules apply.

Uninsured:

Providers can get paid for testing uninsured people. Per the federal government, “Health care providers who have conducted COVID-19 testing or provided treatment for uninsured COVID-19 individuals on or after February 4, 2020 can request claims reimbursement through the program electronically and will be reimbursed generally at Medicare rates, subject to available funding.” See here for details: “COVID-19 Claims Reimbursement to Health Care Providers and Facilities for Testing and Treatment of the Uninsured” <https://www.hrsa.gov/CovidUninsuredClaim>.

VA:

Please contact the VA for its reimbursement policies to non-VA providers. The VA is offering free testing to veterans with VA health benefits (and a doctor’s order) on the West Los Angeles VA campus and at many ARF and RCFE facilities. Phone number for veterans with suspected COVID symptoms: VA 24 Hour Nursing Line (877) 252-4866. Or veterans can get a referral for COVID testing by contacting their VA PCP (primary care provider).

Private insurance:

Healthcare providers will have to collect the insurance information for people who are privately insured and then send claims to each person’s insurance company.

Co-pays:

Providers may not charge any insured people co-pays for COVID testing: “All patients with full-service Medi-Cal or commercial insurance in California will have copays, coinsurance and deductibles waived for COVID-19 testing and screening.” (<https://covid19.ca.gov/healthcare/>). This means healthcare providers may not charge the facility administrator, facility staff, or facility residents for testing people with Medi-Cal, Medicare, or private insurance. See above for how providers can get reimbursement for testing uninsured people.

Billing codes and fee schedules:

Medicare has designated billing codes and fee schedules for COVID testing. See here: “CMS ACTIONS TO EXPAND SARS-CoV-2 TESTING” <https://www.cms.gov/files/document/43020-sars-cov-2-infographic.pdf>.

Medi-Cal is using the Medicare billing codes and fee schedules for “straight” Medi-Cal fee-for-service. See here: “EMERGENCY GUIDANCE FOR MEDI-CAL MANAGED CARE HEALTH PLANS IN RESPONSE TO COVID-19” <https://www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/APL2020/APL20-004.pdf>.

Contact the Medi-Cal health plan for its fee schedule. Some Medi-Cal plans will use the Medicare fee schedule, or if the provider is already contracted with the health plan for a certain fee, the plan will pay that fee.

