

Accountable Care Collaborative Phase II: Program Improvement Advisory Committee: COVID-19 Q&A

Question	Type of Question	Department Response	Additional Resources & Sources
Voting Member Questions:			
As we move into teletherapy services, will the Department open billing codes to include telephone visits, eConsults, and peer to peer support codes?	Telemedicine	Services that are allowed to be provided by telemedicine under the existing policy will no longer be restricted to an interactive audiovisual modality only. Providers may deliver the allowable telemedicine services by telephone or via live chat. All other general requirements for telemedicine services, such as documentation and meeting same standard of care, still need to be met (see https://www.colorado.gov/pacific/hcpf/provider-telemedicine for additional information for requirements and billing guidance). Any Health First Colorado covered physician services that are within the scope of a provider's practice and training and appropriate for telemedicine may be rendered via telemedicine. Services not otherwise covered by Health First Colorado are not covered when delivered via telemedicine. Additionally, the use of telemedicine does not change prior authorization requirements that have been established for the services being provided. Telemedicine does not include consultations provided by facsimile machines, text, email or instant messaging.	https://www.colorado.gov/hcpf/provider-telemedicine
What types of telehealth services will be available for FQHCs and CMHCs and RHCs?	Telemedicine	For the duration of the COVID-19 state of emergency, Health First Colorado is allowing telemedicine visits to qualify as billable encounters for Federally Qualified Health Centers (FQHCs), Rural Health Clinic (RHCs), and Indian Health Services (IHS). Services allowed under telemedicine may be provided via telephone, live chat, or interactive audiovisual modality for these provider types. (see "Temporary Authorization of Telemedicine Services during COVID-19 State of Emergency 3/20/20"	https://www.colorado.gov/pacific/sites/default/files/Update%20-%20Temporary%20Authorization%20of%20Telemedicine%20Services%20during%20COVID-19%20State%20of%20Emergency%2003-20-2020.pdf
Are telehealth services available for both fee for service and behavioral health Medicaid providers?	Telemedicine	On March 18, 2020, the Department announced a temporary expansion of telemedicine services throughout the COVID-19 state of emergency (see Temporary Authorization of Telemedicine Services During COVID-19 State of Emergency).For behavioral health providers, telemedicine is covered under the capitated behavioral health benefit administered by the RAEs. Behavioral health providers should contact their RAE for guidance. For RAE contact information, see www.colorado.gov/hcpf/acphase2 .	https://www.colorado.gov/pacific/sites/default/files/COVID-19%20Behavioral%20Health%20Fact%20Sheet%203-27-2020_0.pdf
Where can providers find more information on telehealth billing practices?	Telemedicine	Please visit HCPF or CDPHEs COVID 19 webpage for additional information	1) https://covid19.colorado.gov/ 2) https://www.colorado.gov/pacific/hcpf/COVID
Will the Department share the 1115 CMS waiver that was submitted and what is the timeline for when it will be reviewed/approved?	Federal	Kim Bimestefer: The Department submitted an 1115 waiver to CMS on Friday, 3/13/20. We have received verbal approval from CMS on certain aspects and expect to receive written approval shortly. Once received, the Department will share on its COVID-19 webpage. Until then, the Department is in constant communication with CMS, stakeholders, and sister agencies daily.	https://www.colorado.gov/pacific/sites/default/files/COVID%20Emergency%20Waiver%20Overview%20-%20203-25-2020.pdf
Has the Department addressed how it will handle the surge in Medicaid applications due to unemployment increases? Has any additional funding been received to help the counties and local public health agencies process applications?	Eligibility & Enrollment	Kim Bimestefer: The Department is monitoring the issue closely. We are tracking the increase in unemployment applications as well as member and provider phone lines. We are also analyzing the budget impact and engaged in conversations with CMS.	
How is the Department communicating with members? How are members informed of where they can receive COVID-19 testing?	Communications	Members are receiving information from both the Department and RAEs. The Department is updating our members by email, text message, and the PEAKHealth app. Go to CO.gov/PEAK and update your communication preferences to make sure you're getting the latest information.	1) CO.gov/PEAK 2) PEAK Health App 3) https://www.healthfirstcolorado.com/covid/
How is the Department primarily communicating policy changes, additional locations outside of the Memo Series?	Communications	The Department is using its COVID-19 webpage to primarily communicate updates as soon as possible. In addition, stakeholders are welcome to sign up for any of the Constant Contact listservs available.	https://visitor.r20.constantcontact.com/manage/optin?v=001HfxrbpGNWZ0IznPp6t3PG2s9XPNi8ZvgFdisKvSnhly8z9JmHyp6DeoLJ3saT6x0SeqRR1ub149uoXxe1ok4jtZfMSQ0BN7S5vclIRO7gdY%3D
How is the Department addressing prescriptions? Will members still receive refills? Are there restrictions on controlled substances?	Pharmacy	Please see the Department's COVID-19 Guidance for Prescribers regarding temporary policy changes.	https://www.colorado.gov/pacific/sites/default/files/COVID-19%20Guidance%20for%20Prescribers%2003-20-2020.pdf
Does the Department have any resources to share with members about how to stay safe while accepting volunteer help from someone they do not know?	Communications	The Department's Health First Colorado webpage has information for members about their health care coverage, tips and advice for seeking care, and how to protect communities and frequently asked questions and answers.	https://www.healthfirstcolorado.com/covid/
Has the Department considered granting Presumptive Eligibility sites the authority to assist community members with enrollment virtually?	Eligibility & Enrollment	Tracy Johnson: No, we have not considered that and appreciate the feedback. We are currently monitoring the rise and discussing mechanisms to handle the increase in applications.	
Does the Department have any information if application processing can continue if county offices are closed? Will the State allow remote processing?	Eligibility & Enrollment	The Colorado's COVID-19 Emergency Waiver Overview document provides information about the proposed temporary eligibility provisions impacted by the pandemic, long-term care temporary changes to ensure the most vulnerable people have access to coverage and services, and proposed support and flexibility for providers as they care for our members during the pandemic.	https://www.colorado.gov/pacific/sites/default/files/COVID%20Emergency%20Waiver%20Overview%20-%20203-25-2020.pdf
What are the ground rules for HIPAA and non-compliant HIPAA modalities?	Compliance	Tracy Johnson. CMS has indicated that there is federal flexibility around HIPAA. The Department requires HIPAA compliance methods for now, but flexibility is being explored.	
Has the Department considered how it handle appeals (related to loss of benefits) for members? How will it assist members who cannot use Court Link to file an appeal?	Eligibility & Enrollment	Tracy Johnson: There are several requests within the waiver regarding eligibility, the Department will need to follow up when we know more about what's been approved but one of the federal flexibilities that was given to us was the ability to backdate to a declaration of federal or state emergency (depends on what legal vehicle we are using).	https://www.colorado.gov/pacific/sites/default/files/COVID%20Emergency%20Waiver%20Overview%20-%20203-25-2020.pdf
Community-based providers, local government agencies, and advocacy organizations are coming together to address imminent needs, how can the PIAC facilitate a coordinated engagement of the RAEs as a conduit for working with HCPF to develop the creative solutions and effective communication?	Communications	The Department is committed to working with its stakeholder community during this time. It will collaborate with the PIAC Co-Chairs to determine an appropriate structure moving forward.	
Has the Department considered any policy changes that will prevent member disenrollments?	Eligibility & Enrollment	The Colorado's COVID-19 Emergency Waiver Overview document provides information about the proposed temporary eligibility provisions impacted by the pandemic, long-term care temporary changes to ensure the most vulnerable people have access to coverage and services, and proposed support and flexibility for providers as they care for our members during the pandemic.	https://www.colorado.gov/pacific/sites/default/files/COVID%20Emergency%20Waiver%20Overview%20-%20203-25-2020.pdf
Will facility-based services be covered under RAE telemedicine policies until COVID-19 subsidies? Specifically thinking about IOP and partial hospitalization programs that may want to temporarily go virtual.	Provider Credentialing / Billing	Tracy Johnson: We included partial hospitalization guidance with HCBS guidance (if you can do it virtually, do it virtually). If it needs to be reiterated in telemedicine guidance - if there's something we haven't talked about we welcome going through that exercise.	https://www.colorado.gov/pacific/sites/default/files/COVID%20Emergency%20Waiver%20Overview%20-%20203-25-2020.pdf
Has the Department considered seeking additional or sequential waivers other than the CMS 1115 waiver, such as the CMS 1135 waiver? Additional, well any changes to the State Plan Amendment be requested?	Federal	Tracy: Yes, the Department is working closely to follow CMS' guidance on which vehicle is appropriate for each type of request. It will consider submitting additional waivers and State Plan Amendment changes.	
Has the Department considered keeping the telehealth/telemed services available permanently after the pandemic has subsided?	Telemedicine	Tracy Johnson: As of right now, these are temporary changes but the Department could use this data to help inform future policy.	

We are going to need more mental health providers when death rate is > 10,000 per day. How will HCPF assure provider credentialing is timely and rates won't be dropped arbitrarily?	Provider Credentialing / Billing	The Department has requested federal flexibility around provider validation and revalidation. We will share more information as we receive approval from CMS.	https://www.colorado.gov/pacific/sites/default/files/Colorado%201115%20Waiver%203-13-2020%20Submission.pdf
The Department has a call in option for enrolling into Medicaid and can accept a signature over the phone, MA and PE sites be given this authority as well?	Eligibility & Enrollment	The Colorado's COVID-19 Emergency Waiver Overview document provides information about the proposed temporary eligibility provisions impacted by the pandemic, long-term care temporary changes to ensure the most vulnerable people have access to coverage and services, and proposed support and flexibility for providers as they care for our members during the pandemic. Members are encouraged to apply for benefits on the PEAK Health website or PEAK Health mobile app.	https://coloradopeak.secure.force.com/
Can the Department also prioritize due process protections so that people who lose coverage have ample time to appeal and retain benefits, etc., and so that the dislocations don't result in non-receipt of notice and lack of ability to appeal.	Eligibility & Enrollment	The Department is aware of these concerns and has begun conversations with its federal partners to determine the appropriate next steps.	
Public Comment Questions:			
Do the RAEs have the guidance/information they need to expedite provider enrollment? Especially as providers are coming out of retirement and DORA is relaxing licensing regulations?	Provider Credentialing / Billing	Matt Sundeen: We've been communicating with the RAEs and will follow up.	https://www.colorado.gov/pacific/sites/default/files/COVID%20Emergency%20Waiver%20Overview%20-%203-25-2020.pdf
Has the Department considered using Connect for Health insurance navigators to assist with the surge in Medicaid applications? Available to help members submit to PEAK Health for approval.	Eligibility & Enrollment	Tracy Johnson: That is a very helpful suggestion, thank you!	
Has there been any discussion about helping to ensure safety net providers, including community mental health centers, remain financially viable despite inevitable decreases in encounters, even though they will be offering telehealth services. We can all imagine there will be pent up demand with increased Medicaid enrollment, once providers are able to see people in person again. Yet some providers will be at risk of laying off staff or closing down programs.	Provider	The Department is aware of these concerns and has begun conversations with its federal partners to determine the appropriate next step. The Department is requesting the ability to increase, supplement, or provide additional fee-for service payment(s) to ensure continuity of operations and assurance of client health, safety, and welfare within fee-for-service benefits but has yet to receive approval.	https://www.colorado.gov/pacific/sites/default/files/Colorado%201115%20Waiver%203-13-2020%20Submission.pdf
Is there any information about how the State will be supporting Medicaid providers (other than primary care) that experience a reduced schedule or have closed their doors during this time?	Provider	The Department is aware of these concerns and has begun conversations with its federal partners to determine the appropriate next step(s). Please see the Colorado's COVID-19 Emergency Waiver Overview the 1115 waiver submission.	https://www.colorado.gov/pacific/sites/default/files/Colorado%201115%20Waiver%203-13-2020%20Submission.pdf
What are the expectations for provider enrollment, it can take 5-8 to become enrolled by a RAE.	Provider	The Department is requesting to waive site visits to temporarily enroll a provider during the effective period and then for an additional ninety (90) days following the end of the effective period to complete any site visits that did not occur during the effective period but has yet to receive approval.	https://www.colorado.gov/pacific/sites/default/files/Colorado%201115%20Waiver%203-13-2020%20Submission.pdf https://www.cdc.gov/coronavirus/2019-ncov/index.html
Are infection/ hospitalization/death rates on a timeline for CO publicly available ?	Statistics	The Department recommends visiting CDPHE's webpage and the CDC webpage for more information.	https://covid19.colorado.gov/
What changes have been made to the credentialing and validation of Medicaid providers to prevent a bottleneck / delay in available providers to serve members. How are behavioral health provider credentialed?	Provider Credentialing / Billing	The Department is aware of these concerns and has begun conversations with its federal partners to determine the appropriate next step.	https://www.colorado.gov/pacific/sites/default/files/Colorado%201115%20Waiver%203-13-2020%20Submission.pdf
Statement: Office of Civil Rights will exercise its enforcement discretion to not impose penalties for noncompliance with the regulatory requirements under the HIPAA Rules against covered health care providers in connection with the good faith provision of telehealth during the COVID-19 nationwide public health emergency.	Compliance	Please visit the Health and Human Services webpage for more information	https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html
Are infection/ hospitalization/death rates on a timeline for CO publicly available ?	Statistics	The Department recommends visiting CDPHE's webpage and the CDC website for additional information.	https://covid19.colorado.gov/
Has the Department requested CMS to waive the 60-day re-certification of orders for home health, PT, OT, etc. services? Extending beyond the 60-day window would be a great relief of administrative burden on providers & ensure services continue for patients.	Federal	Tracy Johnson: Thank you for that suggestion. This may or may not already be included on our list but the Department is working with CMS to address.	