



CHIP Policy Clarification

CHIP POLICY CLARIFICATION 2020-02

ISSUE DATE: March 24, 2020

REISSUE DATE: June 17, 2020

EFFECTIVE DATE: Immediately

SUBJECT: Billing Guidance for Alternative Screening Sites Related to COVID-19

TO: CHIP MCOs

FROM: *Patricia M. Allan*
Patricia M. Allan
Executive Director of CHIP

PURPOSE:

To issue billing guidance for alternative screening sites developed in response to the presence of the COVID-19 coronavirus in Pennsylvania.

BACKGROUND:

On March 6, 2020, Governor Wolf issued a [disaster declaration](#) in response to the presence of the COVID-19 coronavirus in Pennsylvania. This guidance is for hospitals and community providers regarding submitting claims for services provided in alternative screening sites for COVID-19.

On March 9, CMS issued a Memorandum regarding “Emergency Medical Treatment and Labor Act (EMTALA) Requirements and Implications Related to Coronavirus Disease 2019 (COVID-19), which applies to both Medicare, Medicaid and CHIP providers.

DISCUSSION:

The memorandum discusses a hospital’s options to mitigate exposure to COVID-19 and set up alternative screening sites both on and off the hospital campus.



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The Pennsylvania Department of Health, the entity licensing hospitals in the state, issued guidance on the ability of hospitals to set up alternate screening sites for COVID-19. The guidance can be found [here](#).

Hospitals do not need to enroll their on-campus or off-campus temporary screening sites separately with the Department of Human Services (Department). The Department understands the Department of Health considers these sites part of the hospital and the areas are set up as part of the hospital's emergency preparedness plan. Thus, hospitals should use their existing acute care hospitals or hospital outpatient unit locations already enrolled with the Department of Human Services to submit claims for services performed at these on or off campus screening sites.

Community Screening Sites Not Under the Control of a Hospital

Other non-hospital community providers may choose to set up COVID-19 screening sites. Community screening sites not under the control of a hospital and being conducted by a health care provider, such as an independent clinic, federally qualified health care center, rural health center, physician or physician office, laboratory or certified registered nurse practitioner, also do not need to enroll these sites separately. As these sites are temporary in nature, providers should bill from office or clinic sites already enrolled using a place of service that best describes where the service was provided.

Information on CHIP coverage related to COVID-19, including FAQ document can be found on the [CHIP website](#).

Additional information about EMTALA requirements and COVID-19 can be found [here](#).

Additional information is also available on the [CDC website](#) and through [CMS](#).

The Pennsylvania Department of Health has a dedicated page for COVID-19 that provides regular updates. Click [here](#) for the most up to date information regarding COVID-19.

NEXT STEPS:

1. Review the information in this policy clarification with appropriate staff.
2. Implement this policy clarification immediately.
3. This policy clarification will remain in effect while a valid disaster declaration authorized by the Governor related to the COVID-19 virus remains in effect. The OOC may re-issue this policy clarification as appropriate.
4. Questions concerning this transmittal should be directed to Virginia Perry at (717) 772-1110 or via email at virperry@pa.gov.