Billing Guidance for Alternative Screening Sites Related to COVID-19

On March 6, 2020, Governor Wolf issued a disaster declaration in response to the presence of the COVID-19 coronavirus in Pennsylvania. Pursuant to this disaster declaration, the Office of Medical Assistance Programs (OMAP) is issuing guidance to hospitals and community providers regarding submitting claims for services provided in alternative screening sites for COVID-19.

On March 9th, 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 and Medicaid providers.

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

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 in the Medical Assistance (MA) Program. The Department of Human Services 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 hospital enrollment (01-010) or a hospital outpatient unit (01-183) 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 in MA using a place of service that best describes where the service was provided.

This guidance will remain in effect for the duration of the Federal public health emergency related to the COVID-19 virus or until the temporary state regulatory flexibilities are terminated by the authority which initially authorized the suspension if earlier. OMAP may re-issue these guidelines as appropriate.

Additional information about EMTALA requirements and COVID-19 can be found here.

Additional information is also available on the CDC website and through CMS.

Information on MA Program coverage related to COVID-19, including a FAQ document and instructions regarding the procedure codes to use for COVID-19 lab screenings, can be found on the DHS website here.

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.
Thank you for your service to our MA beneficiaries. We value your participation. Check the Department’s website often at: www.dhs.pa.gov.