TEMPORARY CHANGES TO CLINICAL POLICY AND PRIOR AUTHORIZATION

In response to the COVID-19 pandemic, ForwardHealth is temporarily altering certain policy requirements in order to protect the health and safety of our members and providers, as well as to effectively treat members with COVID-19 and prevent further spread of this disease. ForwardHealth will publish additional guidance about the topics addressed in this ForwardHealth Update when the temporary policies related to COVID-19 expire. For the latest information from ForwardHealth regarding COVID-19, refer to the COVID-19: ForwardHealth News and Resources page on the ForwardHealth Portal.

Remote Supervision of Personal Care Services

In response to COVID-19, ForwardHealth published guidance regarding allowable telehealth services in the March 2020 Update (2020-15), titled “Additional Services to Be Provided via Telehealth.” Temporary policies for remote supervision by registered nurses are included in the

AFFECTED PROGRAMS
BadgerCare Plus, Medicaid

TO
All Providers, HMOs and Other Managed Care Programs
The information provided in this ForwardHealth Update is published in accordance with the blanket waiver authority provided by the Centers for Medicare & Medicaid Services under section 1135 of the Social Security Act, pertaining to 42 C.F.R. § 483.20, C.F.R. § 410.38(g)(3), section 1135(b) of the Social Security Act (42 U.S.C. § 1320b-5[g]), Medicaid Home Health Final Rule (CMS-2348-F), and Wis. Admin. Code §§ DHS 106.02(9) and 107.112(3)(c).

Timesheet Submission During the Public Health Emergency
Pursuant to Wis. Admin. Code § DHS 107.112(3)(c), ForwardHealth allows faxed, scanned, or other copied forms of timesheets as acceptable documentation for a personal care worker’s record of care. All original versions of timesheets should be retained by the employee and submitted to the agency once notified that these temporary policies have ended.

Face-to-Face Requirements for Durable Medical Equipment
Pursuant to the Medicaid Home Health Final Rule (CMS-2348-F), ForwardHealth requires a face-to-face visit with a physician or authorized non-physician practitioner for an initial prescription of impacted durable medical equipment or disposable medical supplies as identified by the Centers for Medicare & Medicaid Services. These visits may be completed by telehealth. For more information, refer to the Face-to-Face Requirements Durable Medical Equipment topic (#21017) and the Face-to-Face Prior Authorization Requirement topic (#21037) of the Online Handbook.

Extension of Prior Authorization
These changes are implemented in response to COVID-19 pursuant to section 1135(b) of the Social Security Act (42 U.S.C. § 1320b-5[g]) as requested in Wisconsin’s 1135 waiver request. Beginning March 12, 2020, ForwardHealth will extend prior authorization (PA) dates for all currently approved or approved with modification PA requests due to expire before June 30, 2020, excluding PA requests for prescription drugs, pharmacy-related diabetic supplies, traumatic brain injury, air transport, and Birth to 3 services. In order to not disrupt services to the vulnerable population that receives these services, ForwardHealth will automatically extend PA dates for an additional 90 days. With this extension, providers should be aware of the following:

- Only the requirement to submit a PA for extension of services due to expire between March 12, 2020, and June 30, 2020, is waived during this timeframe. All other requirements remain in place for providers of these services.
- Providers are required to keep complete and accurate documentation for the services listed above as if they were submitting a PA request. Providers will also be required to keep the notice of extension from the Wisconsin
Department of Health Services. Providers should be prepared to submit this documentation with future PA requests and, if necessary, for an audit.

- PA requests currently processing with ForwardHealth will be reviewed for appropriate extensions.
- If changes to the current PA are needed, such as an increase or decrease in the quantity requested, an amendment request must be submitted along with the documentation to support the requested change.

The Department of Health Services has directed BadgerCare Plus and Medicaid SSI HMOs and managed care organizations to adopt these same PA extensions.

**Urgent Advanced Imaging Services Requests**

For medically urgent requests for advanced imaging services delivered on a fee-for-service basis, providers should follow the advanced imaging services urgent PA request instructions. When obtaining PA prior to rendering the service is not feasible, PA requests will be backdated when clinical documentation supports a suspected or confirmed diagnosis of COVID-19, if submitted within 14 days of the date that the service was performed.

**Documentation Retention**

Providers are reminded that they must follow the documentation retention requirements per Wis. Admin. Code § DHS 106.02(9). Additional information regarding documentation requirements is available in the ForwardHealth Online Handbook:

- **Financial Records** (#201)
- **Medical Records** (#202)
- **Preparation and Maintenance of Records** (#203)
- **Record Retention** (#204)
- **Availability of Records to Authorized Personnel** (#1640)

Providers are required to produce and/or submit documentation to ForwardHealth upon request. ForwardHealth may deny or recoup payment for services that fail to meet these requirements. Refusal to produce documentation may result in sanctions including, but not limited to, termination from Wisconsin Medicaid.

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Information Regarding Managed Care Organizations

This ForwardHealth Update contains fee-for-service policy and applies to services members receive on a fee-for-service basis only. For managed care policy, contact the appropriate managed care organization. Managed care organizations are required to provide at least the same benefits as those provided under fee-for-service arrangements.