MEMBER COPAY EXEMPTION FOR COVID-19 LABORATORY TESTING, LABORATORY TESTING-RELATED SERVICES, AND ALL COVID-19-RELATED TREATMENT SERVICES

The federal Families First Coronavirus Response Act (H.R. 6201), effective March 18, 2020, and as of this ForwardHealth Update, expected to last through December 31, 2020, removes Medicaid copay requirements for COVID-19 laboratory testing, laboratory testing-related services, and all COVID-19-related treatment services. This Update explains coordination of the federal copay exemption with the end of the temporary BadgerCare Plus and Wisconsin Medicaid member copay suspension.

BadgerCare Plus and Wisconsin Medicaid Member Temporary Copay Suspension

As communicated in the December 2019 Update (2019-34), titled “All BadgerCare Plus and Wisconsin Medicaid Copays Temporarily Suspended Effective for Date of Service Beginning on January 1, 2020, through June 30, 2020,” member copays for all services...
were temporarily suspended. This suspension included copay exemption for COVID-19 laboratory testing, laboratory testing-related services, and all COVID-19-related treatment services.

This temporary copay suspension ends July 1, 2020, as announced in the June 2020 Update (2020-25), titled “Member Copay Policy Effective July 1, 2020.” Effective for dates of service on and after July 1, 2020, providers are required to resume member copay collection for adult members as applicable.

**COVID-19 Laboratory Testing, Laboratory Testing-Related Services, and COVID-19-Related Treatment Services Continued Copay Exemption**

Despite the resumption of member copay collection for most services as of July 1, 2020, COVID-19 laboratory testing, laboratory testing-related services, and all COVID-19-related treatment services will continue to be exempt from member copay requirements per the federal Families First Coronavirus Response Act.

**COVID-19 Laboratory Testing Subject to Exemption**

COVID-19 laboratory testing is identified by the following procedure codes:

- U0001 (CDC 2019 novel coronavirus [2019-nCoV] real-time RT-PCR diagnostic panel)
- U0002 (2019-nCoV coronavirus, SARS-CoV-2/2019-nCoV [COVID-19], any technique, multiple types or subtypes [includes all targets], non-CDC)
- U0003 (Infectious agent detection by nucleic acid [DNA or RNA]; severe acute respiratory syndrome coronavirus 2 [SARS-CoV-2] [Coronavirus disease (COVID-19)], amplified probe technique, making use of high throughput technologies as described by CMS-2020-01-R)
- U0004 (2019-nCoV Coronavirus, SARS-CoV-2/2019-nCov [COVID-19], any technique, multiple types or subtypes [includes all targets], non-CDC, making use of high throughput technologies as described by CMS-2020-01-R)
- 87635 (Infectious agent detection by nucleic acid [DNA or RNA]; severe acute respiratory syndrome coronavirus 2 [SARS-CoV-2] [Coronavirus disease (COVID-19)], amplified probe technique)
- 86328 (Immunoassay for infectious agent antibody[ies], qualitative or semiquantitative, single step method [eg, reagent strip]; severe acute respiratory syndrome coronavirus 2 [SARS-CoV-2] [Coronavirus disease (COVID-19)])
86769 (Antibody; severe acute respiratory syndrome coronavirus 2 [SARS-CoV-2] [Coronavirus disease (COVID-19)])

COVID-19 Testing-Related Services Subject to Exemption

COVID-19 testing-related services are medical visits that result in an order for, or administration of, a COVID-19 test, are related to furnishing or administering such a test, or to the evaluation of an individual for purposes of determining the need for such a test.

Applicable Evaluation and Management Services and Medical Visits

Reimbursed to Facilities

The COVID-19 testing-related services copay exemption includes any of the following evaluation and management services (identified by applicable Healthcare Common Procedure Coding System procedure codes) for which a copay would normally apply:

- Domiciliary, rest home, or custodial care services
- Emergency department services
- Home services
- Hospital observation services
- Nursing facility services
- Office and other outpatient services
- Online digital evaluation and management services

Applicable Providers

COVID-19 testing-related services provided by the following provider types are subject to the copay exemption:

- Community health centers
- Hospital providers
- Physicians and other professionals who are eligible to provide evaluation and management services
- Rural health clinics
- Tribal federally qualified health centers

Claims Submission Modifier Requirement for Testing-Related Services

Effective for dates of service on and after July 1, 2020, when submitting claims to ForwardHealth for COVID-19 testing-related services of evaluation and
management services and medical visits reimbursed to facilities, providers are required to include modifier CS (cost-sharing for specified COVID-19 testing-related services that result in an order for or administration of a COVID-19 test) to identify the service as exempt from the copay requirement.

Note: Use of the CS modifier applies only to COVID-19 testing-related services; providers should not indicate the CS modifier when submitting claims for copay-exempt COVID-19 laboratory testing.

COVID-19-Related Treatment Services
Effective for dates of service on and after July 1, 2020, any treatment services related to COVID-19 for BadgerCare Plus or Wisconsin Medicaid members are exempt from copay. Providers are instructed not to collect copayment from members for any services in which the diagnosis submitted is U07.1 (2019-nCoV Acute Respiratory Disease).

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Retention of Documentation Reminder
Providers are reminded that they must follow the documentation retention requirements per Wis. Admin. Code § DHS 106.02(9). Information about those requirements can be found in the following Online Handbook topics:

- 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’s Medicaid program.
Information Regarding Claims for COVID-19 Testing-Related Services Submitted to HMOs

Some HMOs in Wisconsin have chosen not to collect copays for members enrolled in BadgerCare Plus and Medicaid SSI. Providers should contact the member’s HMO to determine whether or not to collect a copay for non-COVID-19 services. Providers are required to follow the claims submission modifier requirement for COVID-19 testing-related services outlined in this Update when submitting claims for these services to an HMO.