

**Meadows Institute COVID-19 Regulatory & Reimbursement Newsletter**

***Letter to Providers #50: State and Federal Updates – April 2, 2021***

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With federal and state health care policies changing in response to COVID-19, the Meadows Mental Health Policy Institute (Meadows Institute) is issuing *COVID-19 Regulatory & Reimbursement Newsletters* to support providers. In these newsletters, we highlight recent changes and extensions to regulatory and reimbursement rules, as well as newly published or updated guidance and answers to frequently asked questions.

These newsletters, along with additional information on mental health resources during a pandemic, are posted here: <https://mmhpi.org/work/covid19/>. If you would like to have additional organizations added to our distribution list or have follow up questions on the content, please email Rachael McLaughlin at [rmclaughlin@mmhpi.org](mailto:rmclaughlin@mmhpi.org).

## Texas Updates

### Extended Flexibilities

#### Multiple Medicaid Flexibilities

<b>Date</b>	March 25, 2021
<b>Summary</b>	<p>The following Medicaid and Children’s Health Insurance Program (CHIP) COVID-19 flexibilities have been extended through April 30, 2021:</p> <ul style="list-style-type: none"><li>• <a href="#">Correction to ‘COVID-19 Guidance: Targeted Case Management Through Remote Delivery’</a></li><li>• <a href="#">Waiver Extension for DME Certification and Receipt Form</a></li><li>• <a href="#">Claims for Telephone (Audio-Only) Behavioral Health Services</a></li><li>• <a href="#">Claims for Telephone (Audio-Only) Medical Services</a></li><li>• <a href="#">RHC Reimbursement for Telemedicine and Telehealth Services</a></li><li>• <a href="#">SHARS Services Provided Through Telemedicine or Telehealth</a></li><li>• <a href="#">Claims for Telehealth Service for Occupational, Physical, and Speech Therapy</a></li><li>• <a href="#">Claims for Telephone (Audio-Only) Early Childhood Intervention Specialized Skills Training</a></li><li>• <a href="#">Claims for Telephone (Audio-Only) Nutritional Counseling Services</a></li><li>• <a href="#">Texas Health Steps Checkup Guidance Extended Through July 31, 2020</a></li></ul>
<b>Link</b>	<a href="https://www.tmhp.com/news/2021-03-25-multiple-medicaid-covid-19-flexibilities-extended-through-april-30-2021">https://www.tmhp.com/news/2021-03-25-multiple-medicaid-covid-19-flexibilities-extended-through-april-30-2021</a>

## COVID-19 Update to Telehealth Guidance on CLASS Professional and Specialized Therapies

<b>Date</b>	March 26, 2021
<b>Summary</b>	<p>The following Community Living Assistance and Support Services (CLASS) professional and specialized therapy services are available by telehealth. This is effective March 15, 2020 through April 30, 2021, unless the federal public health emergency ends sooner. The Texas Health and Human Services Commission (HHSC) will update if there are changes.</p> <ul style="list-style-type: none"><li>• Physical therapy</li><li>• Occupational therapy</li><li>• Speech and language pathology</li><li>• Recreational therapy</li><li>• Music therapy</li><li>• Behavior support</li><li>• Dietary services</li><li>• Cognitive rehabilitation therapy</li></ul> <p>The Office of Civil Rights (OCR) has relaxed HIPAA requirements to allow video for telehealth services. Texas Medicaid recognizes OCR’s HIPAA enforcement discretion for telehealth platform requirements. Therapies must have a treatment plan. The goals and outcomes must support being provided through telehealth. Revision of therapy hours may be added to an IPC and authorized by HHSC per the process outlined in <a href="#">IL 2020-46</a>.</p> <p>Acceptable telehealth formats are synchronous audiovisual interaction or asynchronous store and forward technology. Use these with synchronous audio interaction between the client and the distant site provider. Therapies not eligible for delivery by telehealth are:</p> <ul style="list-style-type: none"><li>• Massage therapy</li><li>• Hippotherapy</li><li>• Therapeutic horseback riding</li><li>• Aquatic therapy</li></ul>
<b>Link</b>	<a href="https://www.tmhp.com/news/2021-03-26-covid-19-update-telehealth-guidance-class-professional-and-specialized-therapies">https://www.tmhp.com/news/2021-03-26-covid-19-update-telehealth-guidance-class-professional-and-specialized-therapies</a>

### 1915(c) Waivers: Face to Face Services Coordination Suspension

<b>Date</b>	March 29, 2021
<b>Summary</b>	<p>The suspension of face-to-face service coordination visits for fee-for-service (FFS) Medicaid 1915(c) waiver case managers and service coordinators is extended through April 30, 2021. This temporary policy applies to:</p> <ul style="list-style-type: none"><li>• CLASS</li><li>• Texas Home Living (TxHML)</li><li>• Deaf-Blind with Multiple Disabilities (DBMD)</li><li>• Home and Community-based Services (HCS)</li><li>• General Revenue Service Coordinators</li><li>• Community First Choice Service Coordinators</li><li>• Pre-admission Screening and Resident Review Habilitation Coordinators</li></ul> <p>Case managers, service coordinators, and habilitation coordinators are encouraged to complete visits by phone, telehealth, or telemedicine.</p>
<b>Link</b>	<a href="https://www.tmhp.com/news/2021-03-29-update-covid-19-guidance-ffs-service-coordinators-and-case-managers">https://www.tmhp.com/news/2021-03-29-update-covid-19-guidance-ffs-service-coordinators-and-case-managers</a>

### Revised In-Home Day Habilitation Information for Program Providers for COVID-19

<b>Date</b>	March 25, 2021
<b>Summary</b>	<p>HHSC is temporarily waiving certain requirements in Sections 3710, 4381.3, 4381.7(6) and 4381.7(7) of the Home and Community-based Services Billing Guidelines and the Texas Home Living Billing Guidelines. This is in response to COVID-19 and to provide access to needed day habilitation services.</p> <p>HHSC has published a revision to this guidance <a href="#">IL 2021-16 In-Home Day Habilitation Information for Program Providers for COVID-19</a>, which replaces IL 2021-08. It extends the temporary guidance through April 30, 2021.</p>
<b>Link</b>	<a href="https://www.tmhp.com/news/2021-03-29-hhsc-publishes-revised-home-day-habilitation-information-program-providers-covid-19">https://www.tmhp.com/news/2021-03-29-hhsc-publishes-revised-home-day-habilitation-information-program-providers-covid-19</a>

## Guidance for New and Initial Medicaid Prior Authorizations

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<b>Date</b>	March 25, 2021
<b>Summary</b>	<p>HHSC directed the Texas Medicaid &amp; Healthcare Partnership (TMHP) to process new and initial prior authorization requests, including recertification requests, by relaxing document submission timeframes for providers if they are unable to provide certain required documentation during the COVID-19 emergency. This direction will remain in effect through April 30, 2021. The guidance applies to all state plan services, including:</p> <ul style="list-style-type: none"><li>• Acute care services</li><li>• Long-term services and supports</li><li>• Personal assistance services</li><li>• Personal care services</li><li>• Community First Choice</li><li>• Private duty nursing</li><li>• Day activity and health services</li><li>• Durable medical equipment and supplies</li></ul> <p>Examples of such documentation include:</p> <ul style="list-style-type: none"><li>• Texas Medicaid Provider Procedures Manual-required timely signatures from physicians and other providers</li><li>• Client signatures</li><li>• Up-to-date visit with primary care or ordering physician</li><li>• Certification of timely face-to-face visits</li></ul>
<b>Link</b>	<a href="https://www.tmhp.com/news/2021-03-25-covid-19-guidance-new-and-initial-medicaid-prior-authorizations">https://www.tmhp.com/news/2021-03-25-covid-19-guidance-new-and-initial-medicaid-prior-authorizations</a>

## COVID-19 Update to Temporary Change to HCS and TxHmL Policy for Service Providers of Respite and CFC PAS/HAB

<b>Date</b>	March 29, 2021
<b>Summary</b>	<p>HHSC has lifted the ban on service providers of respite and Community First Choice (CFC) Personal Assistance Services/Habilitation (PAS/HAB) from living in the same home as the person receiving Home and Community-based Services and Texas Home Living program services. This gives access to needed services for people living in their own or family's home. A person's spouse or a minor child's parent still cannot be a paid service provider of these services due to guidelines found in the following:</p> <ul style="list-style-type: none"><li>• <a href="#">HCS Billing Guidelines (PDF)</a>, Section 4691.7(1), 4660(1)</li><li>• <a href="#">TxHmL Billing Guidelines (PDF)</a>, Section 4660(1), 4691.8(1)</li><li>• <a href="#">CFC Billing Guidelines (PDF)</a>, Section 3700(a)(1)</li></ul> <p>This is a temporary policy change. It is effective March 27, 2020 through April 30, 2021 unless the federal public health emergency ends sooner. HHSC will provide updates if there are changes.</p> <p>Program providers must complete the required background checks for all service providers. They must follow:</p> <ul style="list-style-type: none"><li>• The Texas Administrative Code, Title 40, Part 1, Subchapter D and N</li><li>• HCS and TxHmL Rules, <a href="#">§9.177 (n) and (o)</a>, and <a href="#">§9.579 (r) and (s)</a></li><li>• HCS and TxHmL Billing Guidelines Section 3400 for service provider qualifications</li></ul>
<b>Link</b>	<a href="https://www.tmhp.com/news/2021-03-29-covid-19-update-temporary-change-hcs-and-txhml-policy-service-providers-respite-and">https://www.tmhp.com/news/2021-03-29-covid-19-update-temporary-change-hcs-and-txhml-policy-service-providers-respite-and</a>

## Revised Visitation and Other Emergency Rules

<b>Date</b>	March 26, 2021
<b>Summary</b>	<p>HHSC published several revised emergency rules and updated provider letters regarding expanded visitation:</p> <ul style="list-style-type: none"><li>• HHSC published revised Assisted Living Facilities (ALF) <a href="#">Expansion of Reopening Visitation Emergency Rules</a>. The revised rules are effective March 24, 2021. HHSC Long-term Care Regulation published <a href="#">Provider Letter 2021-12 (replaces PL 20- 42 and PL 20-23) COVID-19 Response – Expansion of Reopening Visitation</a>, clarifying COVID-19 visitation flexibilities permitted by newly revised assisted living facility emergency rules.</li></ul>

- HHSC adopted new [Expansion of Reopening Visitation](#) emergency rules that establish criteria for expanded indoor and outdoor visitation as well as essential caregiver visits. These rules are effective March 24, 2021. Further information can be found in [Provider Letter 2021-10, COVID-19 Response – Expansion of Reopening Visitation](#).
- HHSC published [Provider Letter 2021-09](#) Program Provider Response to COVID-19 and Visitation Expansion for HCS. This letter replaces PLs 2020-22 and 2020-40. This letter describes the actions a program provider must take to mitigate COVID-19 according to the Centers for Disease Control and Prevention (CDC) guidance and the criteria for expanded indoor and outdoor visitation as well as essential caregiver visits.

HHSC also revised emergency rules for the following providers:

- [Day Activity and Health Services \(DAHS\) providers'](#) revision includes updates on COVID-19 screening criteria and allows for facility-coordinated activities.
- [Home and Community Support Services Agencies \(HCSSA\) providers'](#) revision requires screening of staff, clients, and household members for COVID-19 and offers alternative methods to provide non-essential services.
- [Prescribed Pediatric Extended Care Centers \(PPECC\) providers'](#) revision includes updates on the screening criteria for certain people authorized to enter a center.

## Data on Texans Vaccinated

<b>Date</b>	March 26, 2021
<b>Summary</b>	Governor Abbott announced that Texas has administered 10 million COVID-19 vaccinations. More than 30% of people who are eligible for Phase 1A, 1B, and 1C have received a vaccine. According to the Texas Department of State Health Services' (DSHS) <a href="#">COVID-19 vaccine dashboard</a> , Texas hospitals have administered nearly 3.6 million COVID-19 vaccines, which is the most vaccines administered by any provide or organization type. More than one million first doses of COVID-19 vaccine have been shipped to providers across Texas since March 29, 2021. DSHS is allocating 818,410 doses to 779 providers in 202 counties. More than 200,000 additional first doses are expected to be available to pharmacy locations and federally-qualified health centers directly from the federal government.
<b>Links</b>	<a href="https://gov.texas.gov/news/post/governor-abbott-announces-ten-million-covid-19-vaccines-administered-in-texas">https://gov.texas.gov/news/post/governor-abbott-announces-ten-million-covid-19-vaccines-administered-in-texas</a>  <a href="https://dshs.texas.gov/news/releases/2021/20210326.aspx">https://dshs.texas.gov/news/releases/2021/20210326.aspx</a>

### Texas Launches Public Health Vaccine Scheduler

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<b>Date</b>	March 29, 2021
<b>Summary</b>	DSHS issued a news release announcing the launch of the <a href="#">Texas Public Health Vaccine Scheduler</a> . The scheduler gives people one place to sign up for a COVID-19 vaccination through multiple public health departments, including the eight DSHS public health regions, which provide public health services in nearly 200 Texas counties, and more than a dozen local health entities across the state.
<b>Link</b>	<a href="https://www.dshs.texas.gov/news/releases/2021/20210329">https://www.dshs.texas.gov/news/releases/2021/20210329</a>

### Texas Expands Vaccine Eligibility to All Adults Starting Monday

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<b>Date</b>	March 23, 2021
<b>Summary</b>	DSHS announced the state's move to expand vaccine eligibility to all, starting March 29, 2021. According to the release, the state expects vaccine supplies to increase the week of the March 29, and providers have made "great strides" vaccinating people in the current priority groups.
<b>Link</b>	<a href="https://www.dshs.state.tx.us/news/releases/2021/20210323.aspx">https://www.dshs.state.tx.us/news/releases/2021/20210323.aspx</a>

### Save Our Seniors Initiative Update

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<b>Date</b>	March 30, 2021
<b>Summary</b>	Governor Abbott announced that the Texas Division of Emergency Management (TDEM), the Texas Military Department (TMD), and DSHS have announced 35 counties participating in the fifth week of the Save Our Seniors COVID-19 vaccine initiative. The Governor announced the Save Our Seniors program in Corpus Christi in February to provide vaccines to seniors throughout the state. To date, 98 counties have participated in the program.
<b>Link</b>	<a href="https://gov.texas.gov/news/post/governor-abbott-announces-35-participating-counties-for-fifth-week-of-save-our-seniors-initiative">https://gov.texas.gov/news/post/governor-abbott-announces-35-participating-counties-for-fifth-week-of-save-our-seniors-initiative</a>



## Free BinaxNOW COVID-19 POC Tests Available for LTC Providers

<b>Date</b>	March 26, 2021
<b>Summary</b>	<p>HHSC, along with TDEM, is expanding the criteria for requesting free BinaxNOW COVID-19 point of care test kits to all the following:</p> <ul style="list-style-type: none"><li>• Nursing facilities</li><li>• Assisted living facilities</li><li>• Intermediate care facilities for individuals with intellectual disability or related conditions</li><li>• Home and community-based services providers</li><li>• Home and community support services agencies</li></ul> <p>Use these free BinaxNOW COVID-19 POC test kits to test anyone including residents, staff, and visitors. Providers must attest to adhere to certain training and reporting requirements and have one of the following:</p> <ul style="list-style-type: none"><li>• Current Clinical Laboratory Improvement Amendment Certificate of Waiver; or</li><li>• Current CLIA laboratory certificate.</li></ul> <p>Providers must <a href="#">complete and submit an attestation form for free BinaxNOW point-of-care antigen COVID-19 test kits</a> to request free BinaxNOW COVID-19 point of care test kits. <a href="#">See revised PL 2020-49</a> for more information. Tests are available while supplies last.</p>
<b>Link</b>	<a href="https://www.tmhp.com/news/2021-03-26-free-binaxnow-covid-19-poc-tests-available-ltc-providers">https://www.tmhp.com/news/2021-03-26-free-binaxnow-covid-19-poc-tests-available-ltc-providers</a>

## Guidance on Mitigation of Staffing Shortages for HCSSA Providers

<b>Date</b>	March 24, 2021
<b>Summary</b>	<p>HHSC has published <a href="#">Provider Letter 2021-11, Mitigation of Staffing Shortages: Vaccinated Staff</a>. The letter helps HCSSAs respond to staffing shortages and includes the use of fully-vaccinated staff.</p>
<b>Link</b>	<a href="https://hhs.texas.gov/about-hhs/communications-events/news/2021/03/hhsc-publishes-guidance-mitigation-staffing-shortages-hcssa-providers-pl-2021-11">https://hhs.texas.gov/about-hhs/communications-events/news/2021/03/hhsc-publishes-guidance-mitigation-staffing-shortages-hcssa-providers-pl-2021-11</a>

## COVID-19 Rapid Testing Program for Texas Youth Summer Camps

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<b>Date</b>	March 30, 2021
<b>Summary</b>	Governor Abbott and TDEM announced the creation of a COVID-19 Rapid Testing Program for Texas youth summer camps. This program will help summer camps that are licensed by DSHS to conduct rapid tests of staff and campers during the summer months. Through this program, TDEM will provide participating summer camps with COVID-19 rapid antigen tests that will be administered to staff and campers who volunteer to participate.
<b>Link</b>	<a href="https://gov.texas.gov/news/post/governor-abbott-tdem-announce-covid-19-rapid-testing-program-for-texas-youth-summer-camps">https://gov.texas.gov/news/post/governor-abbott-tdem-announce-covid-19-rapid-testing-program-for-texas-youth-summer-camps</a>

## Federal Updates

### HHS Expands Access to Vaccines

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<b>Date</b>	March 29, 2021
<b>Summary</b>	<p>The U.S. Department of Health and Human Services (HHS), through a partnership between the Centers for Disease Control and Prevention (CDC) and the Administration for Community Living (ACL), will provide nearly \$100 million to help increase vaccinations among older adults and people with disabilities. These grants will provide assistance with scheduling vaccine appointments, transportation to vaccine sites, direct support services needed to attend vaccine appointments, connection to in-home vaccination options, and education about the importance of receiving the vaccine to older adults and people with disabilities. In addition, these grants will enable aging and disability networks to identify people who are unable to independently travel to vaccination sites and to provide technical assistance to local health departments on improving access to vaccines for people with disabilities and older adults.</p> <p>Additionally, HHS will invest nearly \$10 billion to expand access to vaccines and better serve communities of color, rural areas, low-income populations, and other underserved communities in the COVID-19 response. This funding will expand access to vaccines for vulnerable populations.</p> <p>President Biden also announced that the Administration is increasing the number of pharmacies in the federal pharmacy vaccination program from 17,000 to nearly 40,000 across the country and will stand up a dozen more mass vaccination sites by April 19.</p>

**Links**

<https://www.hhs.gov/about/news/2021/03/29/hhs-to-expand-access-to-covid-19-vaccines-for-older-adults-and-people-with-disabilities.html>

<https://www.whitehouse.gov/briefing-room/statements-releases/2021/03/25/fact-sheet-biden-administration-announces-historic-10-billion-investment-to-expand-access-to-covid-19-vaccines-and-build-vaccine-confidence-in-hardest-hit-and-highest-risk-communities/>

<https://www.whitehouse.gov/briefing-room/statements-releases/2021/03/29/fact-sheet-president-biden-announces-90-of-the-adult-u-s-population-will-be-eligible-for-vaccination-and-90-will-have-a-vaccination-site-within-5-miles-of-home-by-april-19/>

### CMS Updates Medicare COVID-19 Data Snapshot

<b>Date</b>	March 24, 2021
<b>Summary</b>	The Centers for Medicare & Medicaid Services (CMS) released an <a href="#">updated data snapshot</a> detailing the impact of COVID-19 on Medicare beneficiaries, particularly among underserved beneficiaries, including racial and ethnic minorities, adults 85 years old and older, and people with certain pre-existing conditions. Although the data suggests COVID-19 continues to impact certain populations disproportionately, it also points to the importance of COVID-19 vaccines and other opportunities for prevention and treatment in disadvantaged groups.
<b>Link</b>	<a href="https://www.cms.gov/newsroom/press-releases/cms-updates-medicare-covid-19-data-snapshot">https://www.cms.gov/newsroom/press-releases/cms-updates-medicare-covid-19-data-snapshot</a>

### New AstraZeneca Results

<b>Date</b>	March 25, 2021
<b>Summary</b>	AstraZeneca released updated efficacy information noting that its vaccine is 76% effective against symptomatic COVID-19 infection, slightly lower than the figure it first released.
<b>Link</b>	<a href="https://www.astrazeneca.com/media-centre/press-releases/2021/azd1222-us-phase-iii-primary-analysis-confirms-safety-and-efficacy.html">https://www.astrazeneca.com/media-centre/press-releases/2021/azd1222-us-phase-iii-primary-analysis-confirms-safety-and-efficacy.html</a>

## CDC Reports

### Symptoms of Anxiety or Depressive Disorder and Use of Mental Health Care Among Adults During the COVID-19 Pandemic

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<b>Date</b>	March 26, 2021
<b>Summary</b>	Between August 2020–February 2021, the percentage of adults with recent symptoms of anxiety or a depressive disorder increased from 36.4% to 41.5%, and the percentage of those reporting an unmet mental health care need increased from 9.2% to 11.7%. Increases were largest among adults aged 18–29 years and those with less than a high school education. Trends in mental health can be used to evaluate the impact of strategies addressing mental health status and care during the pandemic and help guide interventions for disproportionately affected groups.
<b>Link</b>	<a href="https://www.cdc.gov/mmwr/volumes/70/wr/mm7013e2.htm?s_cid=mm7013e2_w">https://www.cdc.gov/mmwr/volumes/70/wr/mm7013e2.htm?s_cid=mm7013e2_w</a>

### Vaccine Effectiveness Among Health Care Personnel, First Responders, and Other Essential and Frontline Workers

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<b>Date</b>	March 29, 2021
<b>Summary</b>	Prospective cohorts of 3,950 health care personnel, first responders, and other essential and frontline workers completed weekly SARS-CoV-2 testing for 13 consecutive weeks. Under real-world conditions, mRNA vaccine effectiveness of full immunization ( $\geq 14$ days after second dose) was 90% against SARS-CoV-2 infections regardless of symptom status; vaccine effectiveness of partial immunization ( $\geq 14$ days after first dose but before second dose) was 80%. Authorized mRNA COVID-19 vaccines are effective for preventing SARS-CoV-2 infection in real-world conditions. COVID-19 vaccination is recommended for all eligible people.
<b>Link</b>	<a href="https://www.cdc.gov/mmwr/volumes/70/wr/mm7013e3.htm?s_cid=mm7013e3_w">https://www.cdc.gov/mmwr/volumes/70/wr/mm7013e3.htm?s_cid=mm7013e3_w</a>

### JAMA Study on Post-Hospitalization Symptoms

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<b>Date</b>	March 17, 2021
<b>Summary</b>	JAMA Network released a new study about the clinical status of patients four months after being hospitalized with COVID-19. Of the 478 interviewed via telephone, more than 50% reported having a symptom that they did not have prior to COVID-19, including fatigue, cognitive symptoms, and dyspnea.
<b>Link</b>	<a href="https://jamanetwork.com/journals/jama/fullarticle/2777787">https://jamanetwork.com/journals/jama/fullarticle/2777787</a>