



Where We Are Medicaid Reimbursement for Pharmacy 90-days and Early Fills & Billing for COVID Testing

Medicaid Reimbursement for Pharmacy 90 days and Early Fills

The Department was made aware that tribal governments and Indian Health Service may have made the decision to allow for 90 days medications to be filled in March when the State of Emergency was declared.

We quickly began internal conversations on how we could support this decision and a letter was sent in June 2020 to the Tribal Chairs and Presidents and IHS outlining the Departments support of this medication fill policy. The medications approved to be filled are non-controlled medications (excluding gabapentin). Some of the 90-day fills resulted in medications being denied for refill to soon. If the refill to soon denial was accompanied by a 90-day fill denial, the Department will force the edit. Tribes and IHS will need to resubmit the claims to Medicaid and if anyone continues to experience denials they can reach out for assistance.

Billing for COVID-19 Testing:

In April, Montana Governor Steve Bullock called for increased COVID-19 testing across Montana with a challenge to meet the goal of 60,000 tests a month. The focus of this effort was to conduct surveillance testing in an effort to find asymptomatic individuals who may be carrying the virus.

Tribal governments responded to his calling and in a 35-day period, all 8 tribal governments had conducted mass testing events in their communities. About 10,000 total tests were done during these events.

In June, the Department sent a letter to Tribal Chairs and Presidents and IHS providing guidance on reimbursement to Tribes and IHS facilities for these efforts. For Medicaid eligible members, Tribes and IHS can bill for the services with the appropriate laboratory revenue code and one of the appropriate procedure codes that is listed in the letter.

Those codes are

- G2023 [specimen collection specimen any specimen source] and
- G2024 [specimen collection for individual in skilled nursing home facility].

Example 1:

The Blackfeet Tribe's Southern Piegan Health Clinic hosts a drive up COVID-19 testing event. The IHS is not involved and the event is solely put on by the Tribe. The State supplied the testing kits and runs the tests through the state lab. The only service the Tribe is performing is the specimen collection.

Billing:

- *The Tribe would bill the appropriate G code for specimen collection.*

Example 2:

The Blackfeet IHS and Blackfeet Tribe together host a drive up COVID-19 testing event. The Tribe performs the specimen collection and the IHS does registration. The State supplied the testing kits and runs the tests through the state lab.

Billing:

- *The Tribe would bill the appropriate G code for specimen collection.*
- *The IHS would not have a billable service.*

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