

Non-Risk Related MCO Notices

The Texas Health and Human Services Commission (HHSC) has incorporated COVID-19 benefits, CHIP copay, and Autism services into the non-risk payment process. This list reflects the historical MCO notice guidance with a brief description for the non-risk payment process related to COVID-19, CHIP Copay, and Autism Services, which can be accessed through TexConnect.

In response to the COVID-19 public health emergency and the guidance provided by the Centers for Medicare and Medicaid Services (CMS), HHSC is making non-risk payments (NRP) to reimburse MCOs for certain COVID-19 related services.

To comply with the American Rescue Plan Act (ARPA) of 2021, CHIP managed care organizations (MCOs) must ensure COVID-19 related vaccine, treatment, and testing services are provided without cost-sharing, including copayments. For dates of service on and after December 21, 2022, HHSC will use the non-risk payment process to reimburse MCOs for the additional payment to non-pharmacy providers for copays not collected in accordance with ARPA requirements.

Effective for dates of service on or after February 1, 2022, Medicaid Autism Services, to include Applied Behavior Analysis (ABA) evaluation and treatment, are available through the Texas Health Steps-Comprehensive Care Program (THSteps-CCP) for Texas Medicaid recipients who are 20 years of age and younger and who meet the criteria outlined in the Medicaid Autism Services clinical policy. HHSC has initiated a non-risk payment process to reimburse MCOs for Medicaid Autism Services.

Topic	Title of MCO Notice Issued On:	Issued On:
<u>COVID-19 and CHIP Copay</u>	<p><u>Update on Reimbursement for Non-Risk Criteria for COVID-19 and CHIP Copay Waiver</u></p> <p><u>Consistent with CMS guidance and the elimination of certain pandemic-related HCPCS codes, HHSC has added and removed vaccine administration and drug treatment codes from the non-risk payment process for both COVID-19 and medical CHIP copayment reimbursement criteria.</u></p> <p><u>HHSC's NRP COVID-19 reimbursement will end August 31, 2025.</u></p> <p><u>HHSC's non-risk COVID-19 CHIP copay reimbursement will capture any adjustment encounters effective October 1, 2024 and end September 30, 2026.</u></p>	<u>04/07/2025</u>

<u>COVID-19</u>	<p><u>Non-Risk COVID-19 Inpatient Encounters Repriced</u></p> <p><u>On May 31, 2024, HHSC updated the functionality within the FFS equivalent pricing module to do the following:</u></p> <ul style="list-style-type: none">• <u>Allow encounters to be 're-priced' for inpatient encounters.</u>• <u>Ability to reprice all encounters that process through FFS equivalent pricing module.</u>• <u>Determine the impacted encounters which did not capture pricing in the NRP process.</u> <p><u>The repriced NRP encounter payments between June 22, 2023 – February 29, 2024 will be included in the NRP COVID-19 202406 MCO Report.</u></p>	<u>07/05/2024</u>
<u>CHIP Copay</u>	<p><u>Reinstatement of CHIP Co-pays for COVID-19 Vaccines, Treatment, and Testing Services</u></p> <p><u>Aligned with federal requirements, HHSC will reinstate co-pays for CHIP COVID-19 vaccines, treatment and testing services on October 1, 2024.</u></p> <p><u>This notice provides guidance to CHIP MCOs on required actions as a result of the reinstatement of co-pays for CHIP COVID-19 vaccines, treatment and testing services. The HHSC Vendor Drug Program issued a separate MCO notice about pharmacy CHIP co-pays and services: CHIP MCOs: Reinstatement of CHIP Co-pays for COVID-19 Vaccines, Treatment, and Testing Services.</u></p>	<u>05/28/2024</u>
<u>COVID-19 and CHIP Copay</u>	<p><u>Update on Reimbursement for Non-Risk Criteria for COVID-19 and CHIP Copay Waiver</u></p> <p><u>HHSC has added and removed test and diagnostic criteria from the non-risk payment process for both COVID-19 and CHIP Copay reimbursement criteria. HHSC has added additional vaccine administration criteria to the non-risk payment process for both COVID-19 and CHIP Copay reimbursement criteria.</u></p> <p><u>Effective for dates of service on or after September 1, 2023, HHSC is moving COVID costs into the MCO capitation rates for FY 2024. The NRP COVID-19 reimbursement criteria will have an end date of service of August 31, 2023. Medical CHIP copay extract will continue to process any encounters that meet the NRP CHIP Copay criteria through September 30, 2024.</u></p>	<u>06/08/2023</u>

CHIP Copay	<p>Reinstatement of CHIP Co-pays for Medical Office Visits</p> <p><i>Medical Office Visits Co-pays:</i> Starting on May 12, 2023, HHSC and CHIP MCOs will discontinue the non-risk payment process described above to reimburse CHIP MCOs for the additional payment to providers for co-pay(s) not collected from a member for CHIP medical office visits.</p> <p><i>COVID-19 Co-pays:</i> COVID-19 CHIP co-pay related criteria for medical only testing, vaccines administration, medical treatment and pharmacy co-pays related to COVID-19 testing, vaccines and treatment will continue to be processed through the non-risk payment process through September 30, 2024.</p>	03/10/2023
COVID-19 Autism and CHIP Copay	<p>Non-Risk Report Legends for COVID-19, CHIP Copay, and Autism Payments</p> <p><i>The following attachments display the fields and descriptions that are presented in the MCO payment reports for COVID-19, Autism, and CHIP Copay.</i></p> <ul style="list-style-type: none"> • Attachment 1_MCO Encounter Reports Legend for COVID-19 • Attachment 2_MCO Encounter Reports Legend for Autism • Attachment 3_MCO Encounter Reports Legend for CHIP Copay 	03/06/2023
COVID-19 and CHIP Copay	<p>Update on Reimbursement for Non-Risk Criteria for COVID-19 and CHIP Copay</p> <p><i>As vaccines have been extended to new age groups and new codes have been defined, HHSC has added additional vaccine administration criteria to the non-risk payment process for both COVID-19 and CHIP Copay reimbursement criteria.</i></p>	02/09/2023
CHIP Copay	<p>Prohibition of Cost Sharing for COVID-19 Vaccine, Treatment, and Testing Services</p> <p><i>For dates of service on and after December 21, 2022, HHSC will use the non-risk payment process to reimburse MCOs for the additional payment to non-pharmacy providers for copays not collected in accordance with ARPA requirements and for medical office visits. HHSC will use the encounter data submission process to track MCO reimbursement. The following encounter process does not apply to outpatient pharmacy CHIP copayments. HHSC Vendor Drug Program issued a separate MCO notice about pharmacy encounters.</i></p>	09/22/2022

COVID-19	<p>Update on Reimbursement for Non-Risk COVID-19 Criteria</p> <p><i>HHSC has added additional COVID-19 treatment criteria to the non-risk payment process. The list of COVID-19 vaccine-related codes has been subject to frequent change due to introduction of new vaccines and approvals. Additional modification to the list of vaccine-related codes will be addressed in future notices.</i></p>	09/01/2022
COVID-19	<p>Update on Reimbursement for Non-Risk COVID-19 Criteria</p> <p><i>HHSC has added additional COVID-19 criteria to the non-risk payment process. Attachment 1_NRP COVID-19 Reimbursement Criteria has been updated to include the following revised criteria that will be included in future COVID-19 payments: COVID-19 Testing Kits, Additional Monoclonal Antibody codes, Vaccine Administration codes, and Oral COVID-19 Drugs. Removed the end-date of the Treatment timeline of 3/31/2022 to leave it open ended.</i></p>	05/19/2022
COVID-19	<p>Update on Non-Risk COVID-19 Reimbursements</p> <p><i>Recently an MCO raised a concern with the non-risk medical treatment payments. HHSC, in collaboration with TMHP, researched and identified the following issues: Encounters for Z20822 were not captured in the non-risk payment (NRP) extract and the NRP extract was excluding encounters that were priced as \$0 and did not price these encounters accordingly based on the FFS equivalent and the APR-DRG.</i></p>	05/12/2022
Autism	<p>Medicaid Autism Services Updates and Information</p> <p><i>HHSC will provide MCOs regular updates on Medicaid Autism Services implementation, including Licensed Behavior Analyst (LBA) enrollment and MCO Meetings. This notice contains information on the next Post-Implementation Medicaid Autism Services MCO meeting, a request for MCOs to submit their plans around the comprehensive diagnostic assessment, an update to non-risk reimbursement, the Medicaid Autism Services Transition Log, and LBA enrollment updates.</i></p>	04/14/2022
COVID-19	<p>Update on Non-Risk COVID-19 Reimbursements</p> <p><i>The December 2021 and January 2022 non-risk COVID-19 payments were delayed and are expected to be released February 2022. The administration of the COVID-19 vaccine and medical treatments into the non-risk payment begins with the January 2022 payment.</i></p>	02/22/2022

COVID-19	<p>Update on Reimbursement for Administration of COVID-19 Vaccine, Drug Treatment, & Medical Treatment</p> <p><i>HHSC is working with TMHP to acquire the data to reimburse MCOs for the administration of the COVID-19 vaccine, drug treatments, and medical treatments based on criteria. Attachment 1 has been updated with revised criteria that will be used for future COVID-19 vaccine and drug treatment payments. In May 2021, HHSC solicited feedback from the MCOs on the COVID-19 reimbursement criteria. Attachment 2 includes the questions and answers in a Frequently Asked Questions (FAQ) summary.</i></p>	01/10/2022
Autism	<p>Medicaid Autism Services Updates and Information</p> <p><i>HHSC will be providing MCOs regular updates on Medicaid Autism Services implementation. This notice contains information on the next Medicaid Autism Services MCO meeting, readiness review requirements (including a Medicaid Autism Services attestation form), nonrisk payment reimbursement criteria (attached), and feedback on MCO timelines and dependencies.</i></p>	12/02/2021
COVID-19	<p>COVID-19 Reimbursement Strategy Update</p> <p><i>This notice is an update to the MCO notices published on December 23, 2020; January 11, 2021; and March 15, 2021. Reimbursement for COVID-19 related services will be implemented in phases and based on encounter information. In June 2021, MCOs will receive a fifth COVID-19 test and diagnostic reimbursement payment that incorporates the procedure codes.</i></p>	06/24/2021
COVID-19	<p>Proposed COVID-19 Treatment Reimbursement Strategy Update</p> <p><i>HHSC is working with TMHP to acquire the data to make reimbursements for treatment services based on criteria outlined in the Attachment. HHSC is in the process of planning the reimbursement strategy and anticipates a payment to be disbursed in the Fall 2021.</i></p>	05/03/2021
COVID-19	<p>COVID-19 Test & Diagnostic Reimbursement Strategy Update</p> <p><i>This notice is an update to the MCO notices published on December 23, 2020 and on January 11, 2021. Reimbursement for COVID-19 related services will be implemented in phases and based on encounter information. The first payment for COVID-19 test and diagnostic service encounters was entered into the payment system in January 2021 for encounter data retrospective from April 2020 to November 2020. The second payment was entered into the payment system in February 2021 for December 2020 encounter data.</i></p>	03/15/2021

COVID-19	<p>COVID-19 Test & Diagnostic Reimbursement Strategy – Update</p> <p><i>This notice is an update to the MCO notice published on December 23, 2020. Reimbursement for COVID-19 related services will be implemented in phases and based on encounter information. The first payment for COVID-19 test and diagnostic service encounters will be entered into the payment system the first week of January 2021. In mid-January 2021, MCOs will receive the first COVID-19 test and diagnostic reimbursement payments.</i></p>	01/11/2021
COVID-19	<p>COVID-19 Test & Diagnostic Reimbursement Strategy</p> <p><i>This reimbursement strategy will be a phased approach and is based on encounter information. The first payment phase will include COVID-19 test and diagnostic service encounters over four payment processing cycles. In mid-January 2021, MCOs will receive the first COVID-19 test and diagnostic reimbursement payments.</i></p>	12/23/2020