



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

ELIZABETH HERTEL
DIRECTOR

September 4, 2024

TO: Interested Party

RE: Consultation Summary Project 2419-Lab - Termination of COVID-19 Home Test Kit Coverage and Special Reimbursement for COVID-19 Specimen Collection and Clinic Vaccine Administration

Thank you for your comment(s) to the Behavioral and Physical Health and Aging Services Administration relative to Project Number 2419-Lab. Your comment(s) has been considered in the preparation of the final publication, a copy of which is attached for your information.

Responses to specific comments are addressed below.

Comment: How would home bound beneficiaries with complex needs due to disabilities receive COVID specimen collection services?

Response: Homebound Medicaid beneficiaries would continue to receive COVID- 19 diagnostic testing services in the same manner they traditionally receive other medically necessary laboratory services. Medicaid covers medically appropriate transportation to a provider's office, laboratory, or hospital setting for laboratory services or if a beneficiary is receiving home health nursing services, the home health nurse, during an otherwise covered visit, may obtain the sample to send to the laboratory.

Comment: Could the Michigan Department of Health and Human Services (MDHHS) continue coverage of COVID-19 home test kit coverage via an approved Centers for Medicare and Medicaid Services (CMS) Appendix K flexibilities or 1115 demonstration waiver?

Response: If statewide COVID-19 conditions become such that they are determined of special concern by the MDHHS Medical Director and funding is appropriated for continued Medicaid coverage of Over-the-counter test kits, MDHHS will certainly explore if there are any federal flexibilities that may be available for self-collected laboratory tests that do not meet conditions specified in 42 CFR 440.30 outside of a Public Health Emergency declaration or subsequent active surveillance period.

Comment: By terminating separate payment for vaccine administration performed by clinic providers, MDHHS may lose health equity for at risk groups including beneficiaries with disabilities, their family members, and caregivers they were previously gained through the implementation of public health emergency COVID vaccine policies.

Response: Medicaid covered beneficiaries seeking services from a clinic will continue to have access to medical necessary vaccines. Vaccine serum and administration will remain covered and reimbursed by Medicaid through the clinic's applicable payment methodology (Prospective Payment System (PPS) or All-inclusive-rate (AIR)).

Thank you for your inquiry. We trust that previous responses addressed the concerns and questions noted. If you wish to comment further, send your comments to Adriena Krul-Hall at krulhalla@michigan.gov.

Sincerely,

A handwritten signature in black ink that reads "Meghan Groen". The signature is written in a cursive, flowing style.

Meghan Groen, Director
Behavioral and Physical Health and Aging Services Administration