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March 20, 2020

MEMORANDUM

MEMO NO.
QI-2008
FFS 20-04

TO: QUEST Integration (QI) Health Plans
Federally Qualified Health Centers (FQHCs)

FROM:  Judy Mohr Peterson, PhD
Med-QUEST Division Administrator

SUBJECT: **FEDERALLY QUALIFIED HEALTH CENTER TELEHEALTH GUIDANCE DURING PUBLIC HEALTH EMERGENCY PERIOD IN RESPONSE TO COVID-19**

The Med-QUEST Division is issuing guidance on telehealth services provided by Hawaii Federally Qualified Health Centers (FQHCs) provided during and through the public health emergency that was declared by the Secretary of the Department of Health and Human Services on January 31, 2020.

Below are Frequently Asked Questions (FAQs) that we are providing for your reference:

Would MQD consider relaxing the requirement that a FQHC provider must be at an approved FQHC when providing FQHC eligible services in order to receive PPS payment?

In rare cases, such as during a Public Health Emergency, to help ensure services will be available to our beneficiaries, MQD may allow PPS payment for the provision of FQHC eligible services by a FQHC provider who is not at the FQHC when providing these services when the following conditions are met:

- **The FQHC coordinates the services and delivery of services between the beneficiary and the FQHC provider;**
- **If during the course of this care the beneficiary needs additional FQHC services, the FQHC and the provider will coordinate to ensure the beneficiary receives those additional services as if the provider were at the FQHC.**

Regarding relaxing the requirements for the FQHC qualified providers to be a resident in Hawaii:

Currently Hawaii Medicaid requires a FQHC provider to be a resident in the State of Hawaii in order to be qualified to work and bill for services. MQD will allow providers who are not residents to provide services; however, the provider must be licensed in the State of Hawaii.

Would a FQHC be able to provide eligible services to a Medicaid beneficiary via telehealth, who is houseless and not residing in a shelter or homeless shelter, and receive PPS reimbursement?

Under current policy, telehealth is allowed if an individual is at their residence. MQD has determined that eligible FQHC services provided to a houseless individual via telehealth that is within the FQHC's designated HRSA approved area, will be eligible for PPS reimbursement.

Would MQD consider providing PPS even if the FQHC is closed?

This would be allowed only under the extreme situation in which the FQHC had to close its doors because of staff shortage or thorough disinfection of the clinic is required and, no other providers in the immediate area are available to care for the beneficiary.

Please note that MQD is adhering to the Department of Health and Human Services/Office of Civil Rights (DHHS/OCR) guidance on appropriate applications that can be used for telehealth remote communications during the national public health emergency. The guidance was issued on March 17, 2020 and can be provided if needed.

If there are further issues, please feel free to contact Leslie K Tawata, Clinical Standards Office Administrator, via email at ltawata@dhs.hawaii.gov.