March 18, 2020

The Honorable Eric Holcomb, Governor of Indiana
200 W. Washington St., Rm 206
Indianapolis, IN 46204

Re: Emergency Measures for FQHCs and other Ambulatory Health Care Providers Responding to COVID-19 Outbreak in Indiana

Dear Governor Holcomb:

The Indiana Primary Health Care Association (IPHCA), and the 35 Federally Qualified Health Centers (FQHCs) across Indiana who provide primary care services to over 600,000 Hoosiers, appreciate your leadership and efforts responding to the COVID-19 outbreak. On March 6, you declared a public health emergency in Indiana to respond to the outbreak and as a critical part of Indiana’s healthcare system, Indiana’s FQHCs have been working around the clock to respond and provide access to healthcare for some of the most vulnerable Hoosiers in communities across the state.

In order to support their efforts to inform their patients, provide continued access to primary care services, and implement strategies to contain COVID-19, IPHCA has identified the following strategies:

- Allow both FQHC providers and patients to participate in telemedicine outside of health center walls and bill their full PPS rate when providing these services as a distant site telemedicine provider;
- Temporarily allow for the billing of telephonic services;
- When tests become more widely available, allow reimbursement for changes in sites that would allow for testing in the parking lots and presumptively approve temporary locations for care delivery;
- Provide direction to the Medicaid MCEs to encourage them to follow FSSA’s lead on telehealth and other temporary emergency access and billing measures.

Additionally, as FQHCs are dramatically reducing routine and non-medically necessary appointments, FQHCs will need ongoing support to ensure continued access to critical primary healthcare for vulnerable Hoosiers. IPHCA has identified the following strategies:

- Make immediate and estimated payments to those FQHCs that are in a cost settlement receivable position;
- Suspend collection from those FQHCs that are in a cost settlement payable position;
- Consider providing emergency funding or grants to ensure continued access to care;
• Suspend the Medicaid eligibility re-determination process and cost sharing requirements for all those who cannot meet their financial contributions including but limited to, MED Works, Package C, and HIP POWER Account;
• Allow billing for Durable Medical Equipment (DME) and waive prior authorization requirements for giving out surgical masks and respiratory support supplies to those with infections;
• Expedite credentialing of any new providers including those with similar out-of-state credentials and licensure.
• Suspend the revalidation of providers

We thank you Governor Holcomb, and your team at ISDH and FSSA, for your leadership and response to the COVID-19 outbreak. Please know that IPHCA and Indiana’s FQHCs will continue to support your efforts to ensure the safety and well-being of all Hoosiers.

Ben Harvey
CEO

Cc: Secretary Sullivan
Commissioner Box