

**Quarter 1: Section 1115 Family Planning Only Demonstration Waiver** 

Demonstration Year 20: July 1, 2021 - June 30, 2021

**Demonstration Reporting Period: October 1, 2020 - December 31, 2020** 

Demonstration Approval Period: July 1, 2018 - June 30, 2023

**Project Number: 11-W-00134/0** 

# Contents

EXECUTIVE SUMMARY	3
PROGRAM UPDATES	3
POLICY ISSUES AND CHALLENGES	6
QUALITY ASSURANCE AND MONITORING	9
PROGRAM OUTREACH AND EDUCATION	10
Appendix A: FPO Telemedicine/Telehealth Billing and Policy Guidance	12
Appendix B: Background and Definitions	14

#### **EXECUTIVE SUMMARY**

Washington State's 1115 Family Planning Only (FPO) Programs demonstration waiver was originally approved by the Centers for Medicare and Medicaid Services (CMS) in 2001 and became effective July 1, 2001. In May 2018, the waiver was approved for another 5 years through June 30, 2023. The Special Terms and Conditions (STCs) for the waiver require quarterly monitoring reports be submitted 90 days following the end of each quarter. This report provides information on enrollment, utilization, operations, and updates related to the waiver. Washington uses the state fiscal year (SFY) as our demonstration year (DY) period. This report covers services provided during quarter 2 of DY20 October 1, 2020 through December 31, 2020. Appendix B provides background and definitions of the program.

While total enrollees decreased by 24.6% from 5,761 in DY20 Quarter 1 to 4,343 in Quarter 2, participation increased by 82.6% (from 340 to 621 participants). Newly enrolled clients increased by 16.7% from 729 in DY20 Quarter 1 to 851 in Quarter 2. Client enrollment and participation remain predominantly female, driven by the fact that 64.6% of enrollees are post pregnancy. In DY20 to date, the most frequently provided family planning method for all participants was oral contraceptives (i.e., birth control pills) used by 36.7% of unduplicated participants.

Besides family planning and contraceptive care, waiver clients also have access to Neisseria gonorrhea (GC) and Chlamydia trachomatis (CT) screens and tests and cervical cancer screenings. To date, 191 unduplicated waiver participants received a GC/CT test or 2.9% of total waiver enrollees for the demonstration year. Additionally, 12 (or 0.2%) of the unduplicated female participants to date have received a cervical cancer screen while enrolled in the demonstration waiver.

The Washington State Health Care Authority (HCA) administers the waiver in Washington in addition to Medicaid. The waiver includes two Family Planning Only programs: The Family Planning Only – Pregnancy Related (formally known as Family Planning Only Extension), which existed prior to the waiver and the Family Planning Only program (formally known as Take Charge), which began with the waiver. The waiver extends eligibility for family planning services to uninsured women and men capable of producing children and certain groups that need confidential family planning services, all with income at or below 260 percent of the federal poverty level (FPL). Family Planning Only programs cover every FDA approved birth control method and a narrow range of family planning-related services that help clients use their contraceptive methods safely and effectively to avoid unintended pregnancy.

#### PROGRAM UPDATES

# **Current Trends and Significant Program Activity**

#### Administrative and Operational Activities

HCA received comments from providers and navigators on Family Planning Only programs eligibility requirements including specific concerns on the full-scope Apple Health denial eligibility requirement to have access to the FPO programs. HCA worked with CMS to revise the Family Planning Only programs application in 2020 and communicated this change with providers through webinars held on December 8, 10 and 18, 2020. HCA will release the new application in January 2021. We anticipate that changes made to the FPO application will result in an increase in enrollment.

HCA is continuing to allow FPO benefit services to be delivered through telemedicine and temporary COVID pandemic telehealth mediums effective January 1, 2020 until the HCA determines discontinuation. This

guidance was created in March 2020, edited in April 2020 and is included in Appendix A of this report <a href="here">here</a>. As mentioned in a previous quarter report (DY19 Quarter 4), FPO services provided through telemedicine mediums will not expire and are included in current physician billing guides.

# Delivery System and Provider Participation

Access to family planning services is widely available through expanded Medicaid, qualified health plans and other commercial insurance. HCA continues to support efforts to provide Washington residents with access to comprehensive insurance coverage that surpasses the coverage that the FPO programs offer. HCA is invested in seeing that all persons, whose pregnancies and births are paid for by Medicaid, have access to the services they need to plan and space their pregnancies.

HCA also administers a state funded FPO program for populations that do not meet the waiver criteria. There are still gaps in coverage for some Medicaid enrollees, young adults covered by their parents insurance who desire confidentiality, and some immigrant populations. These groups are currently not eligible for the waiver.

Family Planning providers and advocates are also working with HCA to ensure that the waiver population and those not eligible for the waiver are provided services needed to continue to improve access to family planning and family planning-related services, decrease unintended pregnancies and lengthen intervals between pregnancies and births to improve positive birth and health outcomes.

# Enrollment and Participation

Total enrollees has decreased 24.6% over the past demonstration quarter, from 5,761 in DY20 Quarter 1 to 4,343 in DY20 Quarter 2. Notably, this decrease started during the fourth quarter of DY19, due to impacts from COVID-19 on client financial eligibility and delivery of healthcare services, we expected decreases in enrollment and participation during Quarter 4 as it coincided with Washington State's Governor Inslee's 'Stay Home, Stay Healthy' quarantine directives.

We also hypothesize that the decrease in enrollment may be caused by the Public Health Emergency extension of benefits for the Apple Health pregnancy population. Clients that lose the Apple Health pregnancy benefit are automatically enrolled into the Family Planning Pregnancy Related program. Before the COVID-19 pandemic, the Family Planning Pregnancy Related program contributed approximately 70 percent of our enrollees. We plan to include results of the short- and long-term impacts from COVID-19 in the 2018 – 2023 evaluation report.

We will continue to monitor this enrollment and participation as the quarter-to-quarter trends had been stable since the implementation of the Affordable Care Act (ACA).

Of the 4,343 total unduplicated enrollees in the second quarter of DY20, 99.4% enrollees were female. Clients 21-44 years old had the highest enrollment (3,518 or 81.0%) and the highest participation (401 or 64.6%). As expected, enrollment and participation is dominated by female clients since 64.6% of enrollees are post pregnancy and participants choose contraceptives predominately used by females (see Table 9 for program and population descriptions).

Tables 1 through 4 show data on enrollees and participants for DY19 by sex and age group.

Enrollees are all individuals in the demonstration for the specified demonstration quarter, including those

newly enrolled and those still eligible from the previous demonstration quarter.

**Participants** are as all individuals who obtain one or more covered family planning service through the demonstration.

Due to small numbers and the obligation of HCA to protect the privacy of its clients, cell numbers less than 11 are suppressed and noted.

Table 1: Unduplicated Number of Female Enrollees by Age Group** and Quarter					
	14 years old and under	15-20 years old	21-44 years old	Over 45 years old	Total Unduplicated Female Enrollment*
Quarter 1	10	952	4,712	63	5,737
Quarter 2	*	743	3,518	49	4,319
Quarter 3					
Quarter 4					
Year End			•		

<sup>\*\*</sup>Ages for Quarters are calculated based on the last day in the quarter while Age for "Year End" is based on the last day of the DY. Given that a client may age into an older age cohort throughout their 12-month program eligibility period, "Year End" is not a sum of each age cohort.

Table 2: Unduplicated Number of Male Enrollees by Age Group** and Quarter					
	14 years old and under	15-20 years old	21-44 years old	Over 45 years old	Total Unduplicated Male Enrollment*
Quarter 1	*	*	15	*	24
Quarter 2	*	*	15	*	24
Quarter 3					
Quarter 4					
Year End					

 $<sup>^{*}</sup>$  Due to HCA policy regarding the release of small numbers, numbers less than 11 are suppressed.

<sup>\*\*</sup>Ages for Quarters are calculated based on the last day in the quarter while Age for "Year End" is based on the last day of the DY. Given that a client may age into an older age cohort throughout their 12-month program eligibility period, "Year End" is not a sum of each age cohort.

Table 3: Unduplicated Number of Female Participants with any Claim by Age Group** and Quarter						
	14 years old and under	15-20 years old	21-44 years old	Over 45 years old	Total Female Users*	Percentage of Total Unduplicated Enrollment
Quarter 1	*	113	216	*	340	5.9
Quarter 2	*	201	401	*	618	14.2

Quarter 3			
Quarter 4			
Year End			

<sup>\*</sup> Due to HCA policy regarding the release of small numbers, numbers less than 11 are suppressed.

<sup>\*\*</sup>Ages for Quarters are calculated based on the last day in the quarter.

Table 4: Und	uplicated Num	ber of Male	Participants w	rith any Clair	n by Age Group	** and Quarter
	14 years old and under	15-20 years old	21-44 years old	Over 45 years old	Total Male Users*	Percentage of Total Unduplicated Enrollment
Quarter 1	*	*	*	*	*	0.0
Quarter 2	*	*	*	*	*	0.1
Quarter 3						
Quarter 4						
Year End						

<sup>\*</sup> Due to HCA policy regarding the release of small numbers, numbers less than 11 are suppressed.

#### POLICY ISSUES AND CHALLENGES

HCA program staff and CMS continue to work together to address the revised client application in DY20 Q2. HCA received feedback from CMS to revise parts of the citizenship and immigration status section of the FPO application. HCA is reviewing these recommendations, editing and aligning the requested changes with other applications related to federally funded state programs.

The HCA program staff continue to work with providers to clarify questions that arise from the Family Planning Only programs billing guide to ensure that is more user and reference-friendly. The program staff continue to respond to and clarify billing questions and directly resolve billing issues for Family Planning providers on an ad hoc basis.

<sup>\*\*</sup>Ages for Quarters are calculated based on the last day in the quarter.

**Table 5: Demonstration Year 20 Action Plan** 

Ac	tivity	Quarter 1 Update	Quarter 2 Update	Quarter 3 Update	Quarter 4 Update
•	Add the HPV vaccine benefit to the Family Planning Only programs services package.	<ul> <li>HCA received conditional approval from CMS to move forward to add the HPV vaccine to its FPO benefit package.</li> <li>HCA is working internally to get leadership and finance approval for program implementation.</li> </ul>	HCA continues to work internally to get leadership and finance approval for program implementation.		
•	Evolve the benefits package for the Family Planning Only programs through research and financial analysis and feasibility.  Increase the number of clients receiving cervical cancer screening and gonorrhea and chlamydia screening and testing.	HCA is soliciting provider feedback and researching ways to increase the number of clients receiving cervical cancer screening and gonorrhea and chlamydia screening and testing.	HCA is working on a situation and financial analysis for internal leadership and finance review and approval.		
•	Expand eligibility and ensure access to underinsured people, as changes occur in requirements for insurance coverage related to family planning needs on a national level.	HCA is working with providers and navigators to make the application and application approval process for the FPO program as user-friendly and easy to navigate as possible while considering ongoing changes insurance eligibly requirements and other barriers.	HCA continues to analyze and data and monitor potential gaps in coverage for populations and benefits.		

Communicate with	HCA is working with	HCA is working with	
family planning	providers and navigators	Seattle King County	
providers, navigators	to determine best	Public Health on a user-	
and administrators on	practices for their client	friendly FAQ sheet for	
their needs for their	application process to	FPO clients to better	
clients and will create	share during training	understand their	
training and resources	and for upcoming	benefits and the	
based off these needs.	written resources.	program.	

# QUALITY ASSURANCE AND MONITORING

#### Service Utilization

Table 6 shows utilization by birth control method and age group for DY20 (includes quarters 1 and 2). The use of family planning methods are listed according from the most frequently used to the least frequently used. To date, the most frequently provided family planning method for all participants is oral contraceptives (i.e., birth control pills), used by 36.7% of unduplicated participants. This is followed by hormonal injections at 18.2% and emergency contraceptives at 14.4%.

Method		Total Users						
	14 years old and	15-20 years old	21 – 44 years old	45 years old and	Total Participants**	Percent of all		
0  6	under *	1.12	220	older *	(unduplicated)	Methods		
Oral Contraceptive	*	142	220	*	372	36.7		
Hormonal Injection		59	118	*	185	18.2		
Emergency Contraception	*	74	65	*	146	14.4		
Intrauterine Device (IUD)	*	31	93	*	125	12.3		
Contraceptive Implant		29	43	*	72	7.1		
Condom (male and female)	*	28	19	*	48	4.7		
Vaginal Contraceptive Ring	*	*	25	*	32	3.2		
Contraceptive Patch	*	*	14	*	22	2.2		
Spermicide***	*	*	*	*	*	*		
Sterilization- Tubal Procedure & Vasectomy	*	*	*	*	*	*		
Diaphragm / Cervical Cap	*	*	*	*	*	*		
Natural Family Planning	*	*	*	*	*	*		
Total Participants*** (unduplicated)	*	261	498	*	781			

<sup>\*</sup>Due to HCA policy regarding the release of small numbers, some contraceptive methods (i.e., Natural Family Planning, spermicide, sterilization, and diaphragm/cervical cap) were suppressed from the table and total unduplicated participants were recalculated to avoid deriving utilization for this method.

<sup>\*\*</sup>A participant may choose more than one birth control method during the demonstration year and is recorded for each. The numbers for each method or age cohort do not add up to the totals.

<sup>\*\*\*</sup>Includes all topical preparations (i.e. creams, foams, and gels), films, suppositories, and sponges.

Table 7 shows the number of Neisseria gonorrhea (GC) and Chlamydia trachomatis (CT) screens and tests provided to Family Planning Only clients. These services are sexually transmitted infection (STI) testing specifically related to the effective and safe use of the chosen contraceptive and cervical cancer screening. Women ages 13 – 25 receive screening and all women receive testing when symptoms or exposure are reported. Men are limited to testing only when exposure or symptoms are reported. To date, 191 of the unduplicated number of waiver participants received a GC/CT test or 2.9% of total waiver enrollees (6,612, to date) for the demonstration year.

Table 7: Number of Participants Tested for any STD by Demonstration year (to date)		
Total Tests		
	Number	% of total Enrolled
Unduplicated number of participants who obtained an STD test	191	2.9

<sup>\*</sup>The waiver programs only cover GC and CT screening for females ages 13-25. STD testing is also covered if an exposure to a STI increases client's risk to infertility.

Table 8 shows the number of females who have received cervical cancer screening using cervical cytology (Pap test) and/or human papilloma (HPV) testing. Twelve of the female participants received cervical cancer screening in DY20 to date.

Table 8: Total Number of Female Participants who obtained a Cervical Cancer Screening (to date)			
Screening Activity	Number	% of total Females Enrolled	
Unduplicated number of female participants who obtained a cervical cancer screening	12	0.2	

<sup>\*</sup>The U.S. Preventive Services Task Force (USPSTF) and the American College of Obstetricians and Gynecologists (ACOG) recommend cervical cytology every 3 years for those 21-29 years old and for those 30-65 years old choosing either every 3 year cervical cytology or every 5 years with high risk human papillomavirus testing, or every 5 years with a combination of HPV testing and cytology.

#### Program Integrity

There were no program integrity updates in DY20 Quarter 2.

#### *Grievances and Appeals*

There were no grievances and appeals made DY20 Quarter 2.

#### PROGRAM OUTREACH AND EDUCATION

#### General Outreach and Awareness

HCA hosted three Family Planning application update webinars to:

- Review the Family Planning Only (FPO) eligibility guidelines and application process.
- Review the step-by-step process for an applicant to complete a FPO application.
- Review the changes to the application and the new application coversheet FAQ and address any questions.

Over 300 providers, navigators and administrative staff registered and about 200 attended webinars held on December 8, 10 and 18.

HCA also continued working with partnering providers to support their outreach efforts in making FPO services available to their clients. The major outreach of the agency is focused on connecting clients to full scope coverage through Apple Health or a referral to a qualified health plan.

# Target Outreach Campaign(s)

There were no target outreach campaigns held in DY20 Quarter 2.

# Stakeholder Engagement

In DY 20 Quarter 2, HCA solicited feedback from stakeholders including Jefferson County Public Health, Planned Parenthood Columbia Willamette, Grays Harbor County Public Health, Skamania County Public Health, and Seattle King County Public Health on offering gonorrhea and chlamydia screening, testing and treatment for Family Planning Only benefits.

#### Annual Post Award Public Forum

There were no annual post aware public forum activities DY20 Quarter 2.



# Family Planning Only (FPO) Program billing guide for telemedicine/telehealth services offered during the COVID-19 pandemic

In this time of the COVID-19 pandemic, the Health Care Authority (HCA) is aware that usual and customary ways of providing and billing/reporting services may not be feasible. It is also understood that different providers will have different capabilities. Therefore, in the interest of public health, HCA's Apple Health (Medicaid) program is trying to be as flexible as possible and is creating new policies that will allow you to provide medically necessary services and bill or report the encounter with the most appropriate code you determine applicable, using the guidance below.

This FAQ reinforces HCA's current policies regarding telemedicine as defined in <u>WAC 182-531-1730</u> and covers the new telehealth policies that will only be in effect during this health care crisis. We will update this FAQ as necessary to respond to new information as it develops.

The FAQ below was revised after new information was released Friday, March 20, by the Centers for Medicare & Medicaid Services (CMS) in an all-state call about the use of telehealth in Medicaid. Note: Medicaid is not subject to the same policies as Medicare.

#### Frequently asked questions

19 outbreak.

Can providers use telemedicine/telehealth to serve clients receiving Family Planning Only benefits?

Yes. Clients under the Family Planning Only – Pregnancy Related program and the Family Planning Only program (formerly referred to as TAKE CHARGE) are eligible for telemedicine/telehealth services temporarily during the COVID-

The availability of telemedicine/telehealth during the pandemic allows Family Planning Only clients, particularly those in medically underserved areas of the state, improved access to essential family planning services that may not otherwise be available.

ProviderOne has been updated to allow reimbursement for telemedicine/telehealth services for Family Planning Only clients, dating back to the start of the pandemic.

#### What modes of technology can I use to provide services to my patients?

Please refer to Part II of <u>Apple Health (Medicaid) clinical policy and billing for COVID-19 FAQs</u>. Part II describes technologies and modalities, which may be used to provide services to Family Planning Only clients.

How do I bill for services provided to Family Planning Only clients via telemedicine or telehealth? Please refer to Part II of <u>Apple Health (Medicaid) clinical policy and billing for COVID-19 FAQs</u>. Part II outlines how to bill for telemedicine/telehealth services.

(Revised 11/20/2020)

The following codes are covered for Family Planning Only clients receiving services via telemedicine/telehealth: CPT® 99201, 99202, 99203, 99204, 99211, 99212, 99213, 99214.

Comprehensive prevention family planning visits are also covered via telemedicine/telehealth, billed with an FP modifier: CPT® 99384, 99385, 99386, 99394, 99395, 99396, 99401. Comprehensive prevention family planning visits will continue to be limited to once every 365 days.

Bill any of above codes, as appropriate, using modifier CR (catastrophe/disaster) at the line level.

Telemedicine/telehealth services are paid at the same rate as if the services were provided face-to-face.

All services provided to Family Planning Only clients require a primary focus AND diagnosis of family planning.

What other codes could be used if the options described above are not applicable to the care provided? If you are a licensed provider who can bill an E&M code and using the usual procedure code with one of the options above is not applicable, below is a matrix of codes that are also available for telephone and digital evaluation visits. Please see the COVID-19 fee schedule for rates.

Bill these codes using modifier CR (catastrophe/disaster) at the line level.

CPT® Code	Short Description
99441	PHONE E/M PHYS/QHP 5-10 MIN
99442	PHONE E/M PHYS/QHP 11-20 MIN
99443	PHONE E/M PHYS/QHP 21-30 MIN
99421	OL DIG E/M SVC 5-10 MIN
99422	OL DIG E/M SVC 11-20 MIN
99423	OL DIG E/M SVC 21+ MIN

Code	Description
G2012	Brief communication <u>technology</u> -based service, e.g. <u>virtual</u> check-in, by a <u>physician</u> or other qualified <u>health care professional</u> who can report evaluation and management services, provided to an established <u>patient</u> , not originating from a related e/m service provided within the previous 7 days nor leading to an e/m service or <u>procedure</u> within the next 24 hours or soonest available appointment; 5- 10 minutes of <u>medical</u> discussion

CPT® codes and descriptions only are copyright 2019 American Medical Association.

Please note that the revised date on this document only pertains to formatting changes, there have been no policy changes. For questions related to FPO telemedicine billing and claims, please email <a href="mailto:HCAFamilyPlanning@hca.wa.gov">HCAFamilyPlanning@hca.wa.gov</a>.

# Appendix B: Background and Definitions

# **Definition of Terms**

The following terms are used in the report and defined here.

**Enrollees** are defined as all individuals enrolled in the demonstration for the specified demonstration year, including those newly enrolled and those still eligible from the previous demonstration year. This is also called the eligible population.

**Participants** are defined as all individuals who obtain one or more covered family planning services through the demonstration.

**Disenrollment** is defined as having a gap in enrollment of more than four months.

**Retention** is defined as those continuously enrolled or experiencing a gap in eligibility of no more than four months.

**Re-enroll** is defined as clients who dis-enroll, then re-enroll with a gap greater than 4 months or were previously pregnant, but re-enrolled after pregnancy ended.

**Full benefits** includes all full eligible clients, including the new Medicaid Expansion program, and Parent/Caretaker.

**Member months** refer to the number of months in which persons enrolled in the demonstration are eligible for services.

Table 9. Program Description			
Program Goals	<ul> <li>Improve access to family planning and family planning related services</li> <li>Decrease the number of unintended pregnancies</li> <li>Increase the use of contraceptive methods</li> <li>Increase the interval between pregnancies and births to improve positive birth and women's health outcomes</li> <li>Reduce state and federal Medicaid expenditures for averted births from unintended pregnancies</li> </ul>		
Historical population name  Current demonstration	Family Planning Only Extension  Family Planning Only – Pregnancy Related	Take Charge Family Planning Only	
Income eligibility	Income at or below 198 percent of the federal poverty level (FPL)	Income at or below 260 percent of the federal poverty level	
Target population	Recently pregnant women who lose Medicaid coverage after their 60- day post pregnancy coverage ends	<ul> <li>Uninsured women and men seeking to prevent unintended pregnancy</li> <li>Teens and domestic violence victims who need confidential family planning services</li> </ul>	
Coverage period	Additional 10-month coverage following Medicaid 60-day post-pregnancy coverage  • When coverage ends must apply for Medicaid or Take Charge	12-month coverage     No limit on how many times they can reapply for coverage	
Program coverage	Family planning-related services for women include an annual comprehensive family planning preventive medicine visit, screening for gonorrhea and chlamydia for women ages 13 through 25, cervical cancer screening, and services directly related to successfully using a chosen method of contraception	<ul> <li>Family planning-related services for women include an annual comprehensive family planning preventive visit, screening for gonorrhea and chlamydia for women ages 13 through 25, cervical cancer screening, and services directly related to successfully using a chosen method of contraception</li> <li>Family planning-related services for men include an annual comprehensive family planning preventive visit for reducing the risk of unintended pregnancy, condoms and spermicides, and services directly related to vasectomies.</li> </ul>	