



COVID-19 Testing: Nursing Home Reporting under Secretarial Orders 2 & 4 Update & Guidance on Financial Submissions November 13, 2020

Introduction

Aligned with NC Department of Health and Human Services (NC DHHS)'s [Secretarial Order No. 2](#) and subsequent [Secretarial Order No. 4](#) (the Orders), NC DHHS launched the [COVID-19 Testing: Nursing Home Reporting Portal](#) (the Portal) in August, 2020. Through this Portal, nursing home providers covered under the Orders submit evidence of staff testing activity and may submit interim payment requests to support the costs of required testing. All payments are funded by CARES Act resources.

This communication provides updates and additional guidance about the interim payment process to ensure prompt and accurate payment of allowable testing costs.

Providers are strongly encouraged to review [NC Medicaid's Special Bulletin COVID-19 #129: Reporting Requirements and Financial Support to Nursing Homes under Secretarial Order No. 2](#) (Special Bulletin #129) and additional training materials related to the Orders and the Portal, available [here](#).

Updates and Guidance on Submitting Actual Cases

Providers may submit interim payment requests for projected lab-based testing costs. Projected costs **must be followed by actual cost submissions** upon receipt of vendor invoice.

Recent Portal Updates and Guidance:

- **Improved Tie-Back Function between Actual Cost Submission and Related Projected Cost Submissions**
 - Effective November 16, 2020, Portal functionality will enable providers submitting an "Actual Cost" case to specify all earlier "Projected Cost" cases associated with the Actual Cost case being submitted.
- **Invoice Submission Integrity**
 - In order to submit an Actual Cost case, **a provider must upload a scanned copy of the actual vendor invoice. Staff rosters or other alternatives to the invoice are not sufficient.** The Portal coordination team will communicate to providers that have submitted an Actual Case without adequate supporting documentation. Invoices must be received by the deadline communicated in order to be deemed compliant with submission requirements.

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- **Please only submit one invoice per case and only one NPI per case.**
 - If one invoice covers multiple facilities, please submit a separate case for each NPI represented on the invoice. The same invoice which covers multiple facilities may be uploaded for each individual NPI's case.
 - If a provider has multiple invoices for one NPI, please submit a new Actual Cost case for each invoice.
- **Timely Actual Costs/Invoice Submissions**

As was noted in Office Hours during October, within 30 days of receiving an invoice from a testing vendor, the nursing home the provider is expected to submit an Actual Cost case with the invoice attached.
- **Follow up to Providers with High Projected Cost Interim Payments**
 - As noted in Special Bulletin 129, all Projected Cost interim payments are reconciled with subsequent Actual Cost cases.
 - Any Projected Cost not tied to a subsequent Actual Cost is subject to recoupment by NC Medicaid.
 - The Portal Coordination Team is currently identifying those providers that have received numerous interim payments based on projected costs without corresponding actual cost submissions and will be monitoring future submissions closely. Continuous projected cost submissions that are not followed by timely actual invoice submissions may result in denials of future projected cost submissions.
- **Providers Encouraged to Submit Actual Costs for Initial Submission Whenever Possible**
 - While providers may continue to submit interim payment requests based on Projected Costs, providers are encouraged to forgo this option and simply submit Actual Cost submissions if possible. This better ensures prompt payment and streamlines the reconciliation process.

Ensuring Prompt Payment

- Before authorizing payment, each interim payment request ("case") is validated to ensure:
 - Submitting provider provided required testing data for the applicable Reporting Period.
 - Number of tests and related costs are included and the per test cost does not exceed the allowable per test reimbursement amount.
 - Testing date range under a case does not overlap with prior entries or must be otherwise confirmed as appropriate.
- If a case does not meet the required validation, it will not be authorized for payment.
- Interim payment requests that require additional confirmation from the submitting provider are identified through the State's payment request reconciliation process. If a provider does not respond to requests for clarifications in the timeline communicated, relevant payment requests will be held until confirmation is received and processed with the next payment cycle after confirmation. The payment cycle for Portal submission reporting periods is available [here](#). Nursing homes that are not paid through NCTracks will be paid as a state vendor and timelines for payment may vary from those processed through NCTracks.

Submitting Interim Payment Requests for Point of Care (POC) Testing Supplies Not Otherwise Provided by Other Payers

- As noted in Special Bulletin 129, NC DHHS now authorizes payment of incurred point of care testing supply costs not otherwise provided through the federal disbursement process or other channels.

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- As POC testing becomes increasingly utilized among nursing homes, please consider [reviewing the recorded overview for submitting POC testing costs](#) as presented during the Oct. 1, 2020 Office Hours.

Upcoming Webinars to Prepare for CARES Act Reconciliation and Lookback Process

The Department will launch the last phase of its payment reconciliation process in December, 2020. This reconciliation process will extend into 2021.

Join the Department for an overview of the Reconciliation process in a two-part webinar series on:

- Thursday, December 3, 2020, 2:00-3:00 p.m., and
- Thursday, December 10, 2020, 1:30-2:30 p.m.

Providers that have drawn down CARES Act funding under the Secretarial Orders are strongly encouraged to attend both sessions

Please register for both sessions at link provided here:

<https://attendee.gotowebinar.com/register/6092745084644135184>

NC DHHS will provide additional written guidance about the CARES Act Reconciliation and Lookback Process.

Questions about the COVID-19 Testing: Nursing Home Reporting or Related Payments?

Please email Medicaid.ProviderReimbursement@dhhs.nc.gov