




**Commonwealth of Massachusetts**  
**Executive Office of Health and Human Services**  
**Office of Medicaid**  
[www.mass.gov/masshealth](http://www.mass.gov/masshealth)

**MassHealth**  
**Community Health Center Bulletin 104**  
**October 2020**

**TO:** Community Health Center Providers Participating in MassHealth

**FROM:** Daniel Tsai, Assistant Secretary for MassHealth 

**RE:** **Temporary Flexibilities for the Provision of Laboratory Services by Community Health Centers**

### **Background**

Due to the state of emergency declared in the Commonwealth due to the 2019 novel Coronavirus (COVID-19) outbreak, MassHealth published Community Health Center Bulletin 101, which implemented measures to expand the COVID-19 testing capacity within the Commonwealth through community health centers (CHCs). Specifically, that bulletin permitted CHCs to partner with laboratories that are not MassHealth providers to process COVID-19 diagnostic tests that cannot be processed onsite at the CHC.

This bulletin, which supersedes [Community Health Center Bulletin 101](#), dated May 2020, maintains the policy set forth in that bulletin, except that it further clarifies that laboratories seeking to partner with CHCs are required to:

- (1) be certified as an independent clinical laboratory by the Centers for Medicare & Medicaid (CMS), based on the criteria set forth in the Clinical Laboratory Improvement Amendments (CLIA) of 1988, and
- (2) be licensed as a clinical laboratory by the Massachusetts Department of Public Health (DPH).

**As with Community Health Center Bulletin 101, this bulletin shall remain effective for the duration of the Governor's March 10, 2020, Declaration of a State of Emergency within the Commonwealth due to COVID-19.**

### **Laboratory Services Performed by Partners of CHCs**

CHCs provide essential services to MassHealth members, which may include clinical laboratory services, in community settings. MassHealth recognizes that increasing the number of COVID-19 tests administered and processed in the state is essential to detecting and preventing the spread of the virus. Accordingly, MassHealth is temporarily allowing CHCs to partner with laboratories that are not MassHealth clinical laboratory providers but that have been approved by the Executive Office of Health and Human Services (EOHHS) to process COVID-19 tests on behalf of community health centers.

Specifically, notwithstanding 130 CMR 405.432: *Laboratory Services: Eligibility to Provide Services* and 130 CMR 405.434: *Laboratory Services: Services Performed by Outside Laboratories*, CHCs may submit claims to MassHealth for COVID-19-related clinical laboratory

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services that are performed at laboratories outside of the CHC in accordance with this bulletin. A CHC may bill MassHealth for such offsite COVID-19-related clinical laboratory services when:

- the laboratory providing the services on behalf of the CHC is:
  - certified as an independent clinical laboratory by the CMS, based on the criteria set forth in the Clinical Laboratory Improvement Amendments of 1988;
  - licensed as a clinical laboratory by the DPH; and
  - not enrolled as a MassHealth clinical laboratory provider (such laboratories must continue to bill MassHealth directly for the clinical laboratory services that they provide); and
- EOHHS has approved the partnership between the CHC and the non-MassHealth-enrolled laboratory in accordance with the standards that follow.

EOHHS will approve partnerships between laboratories and CHCs on a case-by-case basis. CHCs that wish to partner with a laboratory in accordance with this bulletin should contact Priscilla Portis, Director of FFS Provider Networks, via email at [priscilla.portis@mass.gov](mailto:priscilla.portis@mass.gov). The email should provide the name and location of the laboratory as well as the services that the CHC expects the laboratory to provide. The laboratory may not begin to provide services on behalf of the CHC and the CHC may not bill for such services until EOHHS provides written notice approving the partnership.

CHCs may submit claims for COVID-19 clinical laboratory services provided by EOHHS-approved partner laboratories in the same manner as if the laboratory services were provided onsite at the CHC.

### **MassHealth Website**

This bulletin is available on the [MassHealth Provider Bulletins](#) web page.

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### **Questions**

If you have any questions about the information in this bulletin, please contact the MassHealth Customer Service Center at (800) 841-2900, email your inquiry to [providersupport@mahealth.net](mailto:providersupport@mahealth.net), or fax your inquiry to (617) 988-8974.