



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

**MassHealth**  
**Physician Bulletin 102**  
**October 2020**

**TO:** Providers Participating in the MassHealth Physician Program

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

**RE: Temporary Flexibilities for the Provision of Laboratory Services by Individual Physicians and Group Practices Enrolled in the MassHealth Physician Program**

### **Background**

Given the state of emergency declared in the Commonwealth due to the 2019 novel Coronavirus (COVID-19) outbreak, MassHealth is implementing measures to expand COVID-19 testing capacity within the Commonwealth through:

- (1) individual physicians (provider type 01); and
- (2) group practices (provider type 97) with at least one physician member (collectively, physicians).

Specifically, MassHealth will permit physicians to partner with laboratories that are not MassHealth providers to process COVID-19 diagnostic tests that cannot be processed onsite at the partnering physician's office, as further described in this bulletin.

**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 Physicians**

Physicians provide essential services to MassHealth members, which may include clinical laboratory services, in various 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 physicians 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 physicians.

Specifically, notwithstanding 130 CMR 433.438: *Clinical Laboratory Services: Introduction*, physicians may submit claims to MassHealth for COVID-19-related clinical laboratory services performed at laboratories outside of that physician's office in accordance with this bulletin. A physician may bill MassHealth for such offsite COVID-19-related clinical laboratory services only when:

- the laboratory providing the services on behalf of the physician is

**MassHealth  
Physician Bulletin 102  
October 2020  
Page 2 of 2**

- 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;
  - licensed as a clinical laboratory by the Massachusetts Department of Public Health; 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 physician and the non-MassHealth-enrolled laboratory in accordance with the standards that follow.

EOHHS will approve partnerships between laboratories and physicians on a case-by-case basis. Physicians who 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 physician expects the laboratory to provide. The laboratory may not begin to provide services on behalf of the physician, and the physician may not bill for such services, until EOHHS provides written notice approving the partnership.

A physician with an EOHHS-approved partnership 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 physician's office.

### **MassHealth Website**

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

To sign up to receive email alerts when MassHealth issues new bulletins and transmittal letters, send a blank email to [join-masshealth-provider-pubs@listserv.state.ma.us](mailto:join-masshealth-provider-pubs@listserv.state.ma.us). No text in the body or subject line is needed.

### **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.