

Provider Bulletin

Molina Healthcare of Washington, Inc.

August 10, 2026

Apple Health (Medicaid) and Dual Eligible Special Needs Plan (D-SNP) Member Billing Requirements and Balance Billing Prohibition (Medicaid and Medicare)

Molina Healthcare of Washington, Inc. is reminding participating providers of state and federal requirements regarding member billing and financial protections for Apple Health (Medicaid) members and Dual Eligible Special Needs Plan (D-SNP) members. Providers must comply with all applicable billing regulations and may not seek payment from members when prohibited by Medicaid or Medicare coordination of benefits requirements.

Failure to comply with these requirements may result in corrective action, claim recoupment, provider education, or referral to regulatory authorities.

Understanding D-SNP Member Coverage

Dual Eligible Special Needs Plan (D-SNP) members are eligible for both Medicare and Apple Health (Medicaid). For most covered services, Medicare is the primary payer, and Apple Health serves as the secondary payer. Medicaid protections apply to these members and help cover eligible Medicare cost-sharing obligations. Providers must understand that D-SNP members have special protections from balance billing and inappropriate member billing.

Providers **must not bill Apple Health or D-SNP members** for the following:

- Covered services, **regardless of whether payment was received** from Molina, Medicare or the Health Care Authority (HCA).
- Services for which the provider **did not meet all conditions of payment**.
- Services denied due to **lack of required authorization or incomplete submission of required information**.
- Any service that is covered under the member's Apple Health or D-SNP benefit package.
- Medicare deductibles, copayments, or coinsurance that are protected under Medicaid cost-sharing rules for D-SNP members.
- The difference between billed charges and reimbursement received from Medicare, Medicaid, Molina, or another payer (balance billing).

Balance Billing Prohibition

Balance billing occurs when a provider attempts to collect from a member the difference between the provider's billed charges and the amount paid by Medicare, Medicaid, or a managed care organization. Apple Health members and D-SNP members are protected from balance billing for covered services. Providers may not bill, invoice, collect, or otherwise seek payment from members for these amounts.

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Provider Responsibilities - Providers are responsible for ensuring compliance with Medicaid billing rules, including:

- Verifying member eligibility on the date of service.
- Verifying enrollment in a managed care organization and identifying whether a member is enrolled in a D-SNP plan.
- Correctly coordinating benefits when Medicare is primary and Apple Health is secondary.
- Understanding service limitations and coverage requirements.
- Completing all required authorization and billing processes before seeking reimbursement.
- Providing language assistance services for members with limited English proficiency.
- Maintaining documentation demonstrating compliance with Medicaid and Medicare billing requirements.

Limited Self-Pay Situations

In limited circumstances, a member may choose to self-pay for services. Before services are rendered, providers must comply with all requirements of WAC 182-502-0160 and obtain a completed, signed, and dated HCA Form 13-879, Agreement to Pay for Healthcare Services. Without meeting these requirements, providers may not bill members for covered services.

What Constitutes Billing a member?

- Patient statements or invoices
- Collection activities
- Balance billing
- Requests for Medicare cost-sharing amounts from protected D-SNP members
- Collection of copayments, coinsurance, or deductibles that are the responsibility of Medicaid under applicable rules

Provider Action Required

- Review internal billing and collections policies.
- Educate billing, registration, and front-office staff regarding Apple Health and D-SNP member protections.
- Verify systems are configured to prevent balance billing of Medicaid and D-SNP members.
- Audit current billing practices to identify and correct any non-compliant member billing activities.
- Ensure coordination-of-benefits procedures properly recognize Apple Health as a secondary payer for D-SNP members.

Questions

Provider Services Email: MHW_Provider_Relations@MolinaHealthCare.Com

Key Reminder: D-SNP members have Medicare as their primary coverage and Apple Health (Medicaid) as their secondary coverage. These members are protected from balance billing, and providers may not collect Medicare cost-sharing amounts that are the responsibility of Medicaid.