

Manual: Reimbursement Policy

Policy Title: Telehealth and Telemedicine Expanded Services for

COVID-19

Section: Medicine

Subsection: None

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#### **General Statement**

Effective immediately (March 2020), Moda Health is expanding our policies around telehealth services for our Medicare Advantage, Medicaid and Commercial membership, making it even easier and safer for patients to connect with their health care provider during the COVID-19 outbreak.

## Scope

This policy temporarily supplements RPM052, "Telehealth And Telemedicine Services" due to the COVID-19 public health emergency (PHE). The policy is meant to outline the expanded coverages and changes, rather than going into the extent and detail contained in RPM052.

This policy is effective for dates of service March 6, 2020 (CMS<sup>1, 2</sup>) and will be updated when the PHE criteria noted below change:

- Oregon Commercial plans until the voluntary agreement with the State of Oregon expires.
- Oregon Medicaid plans until the voluntary agreement with the State of Oregon expires.
- Alaska Commercial plans the expanded coverage from the state of Alaska directives has been made permanent. (See AS 21.42.422 & SCS HB 29. The Alaska section of RPM052, "Telehealth And Telemedicine Services" is also being updated.)
- Medicare Advantage plans until directed by CMS that the temporary expanded coverage has ended.

This policy applies to Commercial medical plans, Medicare Advantage plans, and Oregon Medicaid/EOCCO plans.

This policy does not apply to:

- Dental-only plans.
- Vision-only plans.

#### **Reimbursement Guidelines**

## A. All Lines of Business, New Patient versus Established Patient Determinations

Telemedicine services count the same as an in-office visit for the purposes of determining if the patient is a new patient or an established patient when they are receiving future visits and services. For further detail, see RPM052, Section A.

#### **B.** Commercial Plans

- 1. Telehealth services have been expanded to include communication methods that are not realtime and/or do not include audio-visual communication. Many of these are not normally a covered benefit on our standard plans. This includes:
  - a. Telephone calls.
  - b. Email.
  - c. Provider portal communication.
  - d. Instant messaging.
- 2. The federal government has waived HIPAA privacy requirements, so services such as Google Hangouts, FaceTime, Skype, and similar applications and services may be used during this crisis.
- 3. Expanded telehealth services are available for all diagnoses, not just for COVID-19 or suspected COVID-19.
- 4. Providers may perform telehealth services from their own home, if able and appropriate. (OHA<sup>11</sup>)
- 5. Hospital Outpatient Services Accompanying Professional Services Furnished Via Telehealth
  - a. The hospital may bill for the originating site facility fee associated with the telehealth service when both of the following are true:
    - i. The patient is at home or at a temporary expansion site receiving services via telehealth from a physician or nonphysician practitioner who typically furnishes professional services in the hospital outpatient department, including a behavioral health intensive outpatient services or partial hospitalization program.
    - ii. The patient is registered as a patient of the hospital for purposes of receiving those outpatient telehealth services.
  - b. The originating site fee is billed with Q3014 under the revenue code of the hospital outpatient department under which the outpatient services would normally have been provided. (CMS<sup>21</sup>)
- 6. The usual telehealth cost-sharing requirements apply.
  - a. Telehealth cost-sharing is never more than if the service was performed in person.
  - b. Exception: No cost share for the visit when COVID-19 testing is performed or ordered.
- 7. The use of telehealth services is strongly encouraged to contain the spread of this new virus and the COVID-19 outbreak.

## C. Medicare Advantage Plans

- 8. The patient does not have to reside in a rural location to receive telehealth services. Effective March 6, 2020. (CMS<sup>1, 2</sup>)
- 9. The patient can receive telehealth services in their home or any setting of care. Effective March 6, 2020. (CMS<sup>1, 2</sup>)
- 10. Telephones that have audio and video capabilities may be used for telehealth.
- 11. Everyday communication technologies, such as FaceTime and Skype may be used during this PHE crisis.
  - HIPAA violation penalties against providers using everyday communication technologies will be waived by the HHS Office for Civil Rights.
- 12. The list of telehealth services covered under Medicare has been expanded as of March 30, 2020. Medicare has added 85 new procedure codes that will be covered for telehealth services, retroactive to date of service March 1, 2020. (CMS<sup>16</sup>)
  - a. Licensed clinical social worker services, clinical psychologist services, physical therapy services, occupational therapist services, and speech language pathology services can be paid for as Medicare telehealth services.
  - b. The updated complete list of regular telehealth codes and the temporary additions for the PHE for the COVID-19 Pandemic has been posted at: <a href="https://www.cms.gov/Medicare/Medicare-General-Information/Telehealth/Telehealth-Codes">https://www.cms.gov/Medicare/Medicare-General-Information/Telehealth/Telehealth-Codes</a>.
  - c. For all telehealth services performed on 3/1/2020 through the end of the PHE, CMS instructs to not use POS 02, but instead to:
    - i. Bill with the Place of Service (POS) equal to what it would have been in the absence of a PHE.
    - ii. Append modifier 95 (which CMS does not otherwise accept).
    - iii. This will indicate that the service rendered was actually performed via telehealth during the PHE. (CMS<sup>18</sup>)
  - d. Modifiers for Medicare telehealth services:
    - i. Use modifier 95 as instructed above during the PHE.
    - ii. CMS is not requiring the "CR" modifier on telehealth services.
    - iii. Continue to use modifiers GQ and G0 when required by current Medicare rules for traditional telehealth services:
      - 1) Furnished as part of a federal telemedicine demonstration project in Alaska and Hawaii using asynchronous (store and forward) technology, use GQ modifier
      - 2) Furnished for diagnosis and treatment of an acute stroke, use G0 modifier.

- iv. Critical access hospital method II claims should continue to bill with modifier GT. (CMS<sup>18</sup>)
- v. Cost-sharing does not apply for COVID-19 testing-related services (both telehealth and non-telehealth).
  - 1) Use modifier CS for all medical visits (telehealth or non-telehealth) related to COVID-19 testing for dates of service between March 18, 2020 and the end of the Public Health Emergency (PHE).
  - 2) For detailed information about what qualifies a visit to be related to COVID-19 testing, see 2020-04-07-MLNC-SE. (CMS<sup>19</sup>)
- 13. <u>E-visits</u> are not considered telehealth by CMS; they are covered by Medicare separately from the telehealth rules.
  - a. E-visit procedure code descriptions state "established patients" but during the COVID-19 PHE these codes may be used for new patient visits also. (CMS<sup>17</sup>)
  - b. E-visits do not have rural location requirements.
  - c. Licensed clinical social workers, clinical psychologists, physical therapists, occupational therapists, and speech language pathologists can provide e-visits and report them using HCPCS codes G2061-G2063.
  - d. A broad range of clinicians (CMS<sup>17</sup>, CMS<sup>22</sup>), including physicians can report telephone evaluation and management services using codes that have temporarily been changed to a status A (Active): (CMS<sup>17</sup>)
    - i. 99441-99443 for scheduled or provider-initiated telephone contact.
    - ii. 98966-98968 for telephone contact initiated by the patient, parent, or guardian.
- 14. <u>Virtual check-ins</u> (G2010, G2012) are not considered telehealth services by CMS; they are covered by Medicare separately from the telehealth rules.
  - a. Virtual check-in services can be provided to new patients in addition to established patients. (CMS¹6)
  - b. Virtual check-ins do not have a rural location requirement.
  - c. Virtual check-ins do not have specific originating site limitation.
- 15. CMS is allowing telehealth to fulfill many face-to-face visit requirements for clinicians to see their patients in inpatient rehabilitation facilities, hospice and home health. (CMS<sup>16</sup>)
- 16. Any health care practitioner working for a Rural Health Clinic (RHC) or a Federally Qualified Health Center (FQHC) can furnish distant site telehealth services within the provider's scope of practice. (CMS<sup>20</sup>)
  - a. Telehealth services can be furnished from any location, including the provider's home, during the time that they are working for the RHC or FQHC.

- b. RHCs and FQHCs must use HCPCS code G2025 (*Distant Site Telehealth Services RHC/FQHC*) to identify services that were furnished via telehealth during the PHE. This is a new RHC/FQHC specific G code for distant site telehealth services.
- 17. The usual telehealth cost-sharing requirements apply.
  - a. Telehealth cost-sharing is never more than if the service was performed in person.
  - b. Exception: No cost share for the visit when COVID-19 testing is performed or ordered.
- 18. Hospital Outpatient Services Accompanying Professional Services Furnished Via Telehealth
  - a. The hospital may bill for the originating site facility fee associated with the telehealth service when both of the following are true:
    - i. The patient is at home or at a temporary expansion site receiving telehealth services from a physician or nonphysician practitioner who typically furnishes professional services in the hospital outpatient department.
    - ii. The patient is registered as an outpatient of the hospital for purposes of receiving those outpatient telehealth services.
  - b. The originating site fee is billed with Q3014 under the revenue code of the hospital outpatient department under which the outpatient services would normally have been provided. (CMS<sup>21</sup>)
- 19. These relaxed telehealth requirements apply to telehealth services for all diagnoses, not just for COVID-19 or suspected COVID-19.
- 20. Other related expanded permissions:
  - a. Remote patient monitoring is not considered telehealth by CMS; it is covered by Medicare separately from the telehealth rules. CMS is making it clear that clinicians can provide remote patient monitoring services to patients with acute and chronic conditions and for patients with only one disease. For example, remote patient monitoring can be used to monitor a patient's oxygen saturation levels using pulse oximetry. (CMS<sup>16</sup>)
  - b. CMS is allowing physicians to supervise their clinical staff using virtual technologies when appropriate, instead of requiring in-person presence. (CMS<sup>16</sup>)

#### D. Medicaid Plans

- Telehealth visits can be provided by telephone when appropriate during the COVID-19 crisis. The requirement for synchronous visits with both audio and video capability is temporarily waived.
- 2. Everyday communication technologies, such as FaceTime and Skype may be used for patient contact during this PHE crisis.
  - a. Certain requirements for encryption and HIPAA violation penalties will not be enforced by federal authorities during this crisis.
  - b. HIPAA compliant platforms are of course preferred when available.

- 3. The patient may be at home or in a health care setting.
- 4. CPT codes 99441-99443 & 98966-98968 (Telephone assessment and management service) are temporarily open for use by Behavioral Health providers.
- 5. Telehealth visits are covered for inpatient and outpatient services for new or established patients.
- 6. Telehealth consultations are covered for emergency and inpatient services.
  - a. Limited information provided by one clinician to another that does not contribute to collaboration (e.g., interpretation of an electroencephalogram, report on an x-ray or scan, or reporting the results of a diagnostic test) is not considered a consultation. (OHA<sup>3</sup>)
  - b. Consultation requirements of request from and report back to another provider must be documented to report a telehealth consultation service.
- 7. Providers may perform telehealth services from their own home, if able and appropriate. (OHA11)
- 8. Effective January 1, 2021, the Oregon Health Authority, Public Health Division, Maternal and Child Health Section is temporarily adopting OAR 333-006-0170 to support appropriate response during an outbreak or epidemic of an infectious disease. The rule allows Newborn Nurse Home Visiting services (98960, 99501, 99502) provided under OAR 333-006-0120 to be provided by telehealth during the COVID-19 pandemic to protect the health and safety of the home visiting workforce and families receiving the services. (OHA<sup>24</sup>, OHA<sup>25</sup>)
- 9. Reimbursement requirements:
  - a. Bill covered telemedicine procedure codes with place of service 02. The use of telehealth POS 02 certifies that the service meets the telehealth requirements.
  - b. Modifier GT is required for some behavioral health services (Please see BH Fee Schedule).
  - c. The GQ modifier is still required when applicable. GQ modifier means; via Asynchronous Telecommunication systems.
  - d. Modifier 95 is allowed for telemedicine services
  - e. Bill with the transmission site code Q3014; (where the patient is located).
  - f. The evaluating practitioner at the distant site may bill for the evaluation, but not for the transmission site code.
  - g. For members with Medicare as primary, bill according to CMS guidelines. As secondary will process based on Medicare paid amounts, telemedicine coding doesn't have to match OHP claims coding to pay secondary in MMIS per OAR 410-120-1280.
  - h. Important information related to COVID-19 claims tracking:

OHA would like to track claims related to COVID-19. Please use the following modifiers for all COVID-19 related claims (telehealth or non-telehealth services):

i. Modifier CR: Professional claims.

- ii. Condition code DR: Institutional claims.
- 10. The usual telehealth cost-sharing requirements apply.
  - a. Telehealth cost-sharing is never more than if the service was performed in person.
  - b. Exception: No cost share for the visit when COVID-19 testing is performed or ordered.
- 11. These relaxed telehealth requirements apply to telehealth services for all diagnoses, not just for COVID-19 or suspected COVID-19.

# **Codes, Terms, and Definitions**

# **Acronyms Defined**

Acronym		Definition	
ABA	=	Applied Behavior Analysis	
AHA	=	American Hospital Association	
AMA	=	American Medical Association	
ASO	=	Administrative Services Only	
CDC	=	Centers for Disease Control	
CKD	=	Chronic Kidney Disease	
CMS	=	Centers for Medicare and Medicaid Services	
СРТ	=	Current Procedural Terminology	
ED	=	Emergency Department (also known as/see also ER)	
EOCCO	=	Eastern Oregon Coordinated Care Organization	
ER	=	Emergency Room (also known as/see also ED)	
ESRD	=	End Stage Renal Disease	
FQHC	=	Federally Qualified Health Center	
HCPCS	=	Healthcare Common Procedure Coding System	
		(acronym often pronounced as "hick picks")	
HHS	=	The U.S. Department of Health and Human Services (HHS)	
HIPAA	=	Health Insurance Portability and Accountability Act	
ICD-10-CM	=	International Classification of Diseases, Tenth Edition, Clinical Modification	
ОНА	=	Oregon Health Authority	
PHE	=	Public Health Emergency	
PHEIC	=	Public Health Emergency of International Concern	

Acronym		Definition	
RHC	=	Rural Health Clinic	
WHO	=	World Health Organization	

# **Definition of Terms**

Term	Definition
Pandemic	A global outbreak of disease.
Public Health Emergency	An extraordinary event which is determined to constitute a public health risk through the spread of disease and requires a coordinated response.
	A formal declaration by the World Health Organization (WHO) of a public health emergency of international scale. (Wiki $^{10}$ )

## Procedure codes (CPT & HCPCS):

For a list of telehealth services covered under Medicare, see:

https://www.cms.gov/Medicare/Medicare-General-Information/Telehealth/Telehealth-Codes.

(Note the CMS list at this link was updated as of March 30, 2020 @ 6:15 PM to include 85 codes temporarily added for use during the COVID-19 PHE.)

For a list of telehealth services covered under Medicaid/EOCCO, see:

https://www.eocco.com/eocco/-/media/eocco/pdfs/eocco medicaid-telemedicine.pdf

For a list of telehealth services covered under Medicaid/OHSU Health CCO, see:

https://www.ohsu.edu/sites/default/files/2020-

<u>06/OHSU%20Health%20Services</u> <u>Medicaid%20Telemedicine%20Overview%20Generic%206.9.2</u>

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For Commercial plans, here is the list of procedure codes: (codes & key changes related to the PHE are in red font)

Type of Service	What is the Service?	HCPCS/CPT Code	Coding & Helpful Information
Commercial Telehealth Visits	A visit with a provider that uses telecommunication systems between a provider and a patient.	Common telehealth services include: • 99201 – 99215 (Office or other outpatient visits)	Use POS 02.  Modifier 95 is optional.
		See also separate listings for:  Consultation services, pages 2 & 3.  Telehealth visit at hospital or facility, page 3.	
Specific Type of Visits, done by Telehealth	A visit with a provider for a specific purpose (see each code description) with the use of telecommunication systems between a provider and a patient.	<ul><li>96040</li><li>99473</li><li>G0372</li><li>G9156</li></ul>	Use POS 02.  Modifier 95 is optional.
Virtual Check-in	A brief (5-10 minutes) check-in with your practitioner via telephone or other telecommunications device to decide whether an office visit or other service is needed. A remote evaluation of recorded video and/or pictures/images submitted by an established patient.  This is NOT an advice nurse call, this is communication with the provider themselves.	<ul> <li>G2012</li> <li>G2010</li> <li>G0071 (RHC/FQHC equivalent of G2012 or G2010)</li> </ul>	Use POS 02. (Audio-visual requirement is waived for the PHE.)  Modifier 95 is optional.  Expanded coverage during PHE for most/standard Commercial plans.  Moda accepts Medicare  HCPCS codes for Commercial plans when they are the most accurate and detailed code for the service (as in this case).

Type of Service	What is the Service?	HCPCS/CPT Code	Coding & Helpful Information
E-visits	A communication between a patient and their provider through an online patient portal.	<ul> <li>99421, 99422, 99423</li> <li>98970, 98971, 98972 (preferred codes)</li> <li>G2061, G2062, G2063 (acceptable codes)</li> </ul>	Use POS 02. (Audio-visual requirement is waived for the PHE.)  Modifier 95 is optional.  Expanded coverage during PHE for most/standard Commercial plans.  Code descriptions require an established patient relationship.  For new patients, use 99201 – 99205.
Telephone E/M unrelated to face-to-face E/M (established patient)	Telephone communication between a patient and their provider.  This is NOT an advice nurse call, this is communication with the provider themselves.	<ul> <li>98966 – 98968</li> <li>99441 – 99443</li> </ul>	Use POS 02. (Audio-visual requirement is waived for the PHE.)  Modifier 95 is optional.  Expanded coverage during PHE for most/standard Commercial plans.  Code descriptions require an established patient relationship.  Code description requires call not be related to another E/M in past 7 days or lead to E/M next 24 hours or soonest available.
Interprofessional consult/referral	Professional to professional communication about a patient for the purpose of making a referral or obtaining a consult on the patient's condition and care.  The patient is not present for the communication.	<ul> <li>99446 – 99449</li> <li>99451</li> <li>99452</li> </ul>	Do not use POS 02; code description is specific.  No need to use modifier 95.  Consultation requirements of request from and report back to another provider must be documented to use 99446 – 99449, 99451.

Type of Service	What is the Service?	HCPCS/CPT Code	Coding & Helpful Information
Telehealth Office	A consultation at the request of	• 99241 – 99245	Use POS 02.
Consultation	another provider that uses		Modifier 95 is optional.
	telecommunication systems		Moda Health Commercial
	between a provider and a		plans accept consultation
	patient, with a report back to the requesting provider.		procedure codes.
			Consultation requirements of request from and report back to another provider must be documented to use a consultation code.
Telehealth visit	A visit that uses	• 99217 – 99220	Use POS 02.
at hospital, SNF,	telecommunication systems	• 99221 - 99223	Modifier 95 is optional.
or other facility	between a provider and a patient in a hospital, SNF, or	• 99224 – 99226	Prolonged services require
	other facility environment.	<ul><li>99231 – 99233</li><li>99234 – 99236</li></ul>	clear time and content
	Series radiney environments.	<ul><li>99234 – 99236</li><li>99238 – 99239</li></ul>	documentation.
		<ul><li>99238 – 99239</li><li>99281 – 99285</li></ul>	
		• 99291 - 99292	
		• 99304 - 99306	
		• 99307 – 99310	
		• 99315 – 99316	
		• 99356, 99357	
		• 99468 – 99469	
		• 99471 – 99472	
		• 99475 – 99480	
Telehealth	A consultation at the request of	• 99251 – 99255	Use POS 02.
hospital	another provider that uses	• G0406 – G0408	Modifier 95 is optional.
consultation	telecommunication systems	• G0425 – G0427	·
	between a provider and a	• G0508 – G0509	Moda Health Commercial
	patient at a facility (inpatient, emergency department, etc.),		plans accept consultation procedure codes.
	with a report back to the		Consultation requirements of
	requesting provider.		request from and report back
			to another provider must be
			documented to use a
			consultation code.
Telehealth visit,	A visit that uses	• 99327 – 99337	Use POS 02.
Home	telecommunication systems	• 99341 - 99350	Modifier 95 is optional.
	between a provider and a		and so is optional.
	patient in a hospital or facility		
	environment.		

Type of Service	What is the Service?	HCPCS/CPT Code	Coding & Helpful Information
Care Planning &	A care planning or care	• 99366	Use POS 02.
Care Management	management service performed with the use of	<ul><li>99495, 99496</li><li>99497, 99498</li></ul>	Modifier 95 is optional.
Services	telecommunication systems between a provider and a patient.	• G0506	
Preventive E/M	A preventive visit with a provider with the use of telecommunication systems	<ul> <li>99381 – 99397</li> <li>G0438, G0439</li> <li>G0513, G0514</li> </ul>	Use POS 02.  Modifier 95 is optional.
	between a provider and a patient.		Expanded coverage during PHE for most/standard Commercial plans.
			To the extent that preventive services can and are performed during the PHE, if able to be effectively performed by telecommunications technology, they are covered and allowed as telehealth.
Specific	One of a variety of screening or	• 96127	Use POS 02.
screening or preventive service, mandated or	preventive services with the use of telecommunication systems between a provider	<ul> <li>96160, 96161</li> <li>99406 – 99407</li> <li>99408 – 99409</li> </ul>	Modifier 95 is optional.
recommended	and a patient.	• 0488T	
recommended		<ul><li>G0296</li><li>G0396, G0397</li></ul>	
		• G0442, G0443,	
		G0444, G0445, G0446, G0447	
Health behavior	Health behavior assessment or	• 96156	Use POS 02.
assessment or intervention	intervention service with the use of telecommunication systems between a provider and a patient.	<ul><li>96158 – 96159</li><li>96164 - 96171</li></ul>	Modifier 95 is optional.
Behavioral	Mental Health or Chemical	• H0035	Use POS 02.
Health partial hospitalization	Dependency partial hospitalization service(s) with		Modifier 95 is optional.
	the use of telecommunication		
	systems between a provider or		
	provider team and a patient.		

Type of Service	What is the Service?	HCPCS/CPT Code	Coding & Helpful Information
Behavioral	Mental Health or Chemical	• H0015	Use POS 02.
Health intensive outpatient	Dependency intensive outpatient service(s) with the use of telecommunication systems between a provider or provider team and a patient.	• S9480	Modifier 95 is optional.
Behavioral Health case management  Radiation Treatment Management	Mental Health or Chemical Dependency case management service(s) with the use of telecommunication systems between a provider or provider team and a patient. Radiation Treatment Management with the use of telecommunication systems	<ul><li>T1016</li><li>77427</li></ul>	Use POS 02.  Modifier 95 is optional.  Use POS 02.  Modifier 95 is optional.
Mental Health or	between a provider and a patient.  A mental health or chemical	• 90791, 90792	Use POS 02.
Chemical Dependency service	dependency service that uses telecommunication systems between a provider and a patient.	<ul> <li>90832 – 90838</li> <li>90785</li> <li>90839, 90840</li> <li>90845</li> <li>90846 – 90853</li> <li>90863</li> <li>90887</li> <li>99354, 99355</li> <li>G2086 – G2088</li> <li>G0459</li> <li>H0001, H0002, H0004, H0005, H0014, H0031, H0039, H0050, H2000, H2001, H2010, H2011, H2012, H2011, H2015, H2017, H2019, H2021, H2025, H2028, H2033, H2035</li> </ul>	Modifier 95 is optional.  Prolonged services require clear time and content documentation.
Prenatal Care Services	A prenatal care service that uses telecommunication systems between a provider and a patient.	• H1000, H1001, H1002, H1003	Use POS 02.  Modifier 95 is optional.

Type of Service	What is the Service?	HCPCS/CPT Code	Coding & Helpful Information
Newborn Nurse Home Visits	A newborn (0-6 months) nurse home visit that uses telecommunication systems between a provider and a patient (newborn & parents).  (Ref: SB 526, OAR 333-006-0170)	98960, 99501, 99502	Use POS 02. Modifier 95 is optional.
Nutrition Therapy	O120, and OAR 333-006-0170.)  A medical nutrition therapy service that uses telecommunication systems between a provider and a patient.	• 97802 – 97804 • G0270	Use POS 02.  Modifier 95 is optional.
Disease management	A disease management service that uses telecommunication systems between a provider and a patient.	<ul> <li>98960 – 98962</li> <li>G0108 – G0109</li> <li>G0245 – G0246</li> <li>S0320</li> </ul>	Use POS 02.  Modifier 95 is optional.
Neuro/Cognitive Services	A Neuro/Cognitive exam or testing with the use of telecommunication systems between a provider and a patient.	<ul> <li>96116</li> <li>96125</li> <li>96130 – 96139</li> </ul>	Use POS 02.  Modifier 95 is optional.
Speech Therapy	A speech therapy service that uses telecommunication systems between a provider and a patient.	<ul> <li>92507 – 92508</li> <li>92521 – 92524</li> <li>96105</li> <li>\$9152</li> </ul>	Use POS 02.  Modifier 95 is optional.
Physical Medicine and Rehabilitation (PT, OT, etc.)	A physical medicine & rehabilitation service that uses telecommunication systems between a provider and a patient.	<ul> <li>97110, 97112, 97116</li> <li>97161 – 97168</li> <li>97535, 97750, 97755, 97760, 97761</li> </ul>	Use POS 02.  Modifier 95 is optional.
Applied Behavior Analysis (ABA) services	An Applied Behavior Analysis (ABA) service that uses telecommunication systems between a provider and a patient.	• 97151-97158	Use POS 02.  Modifier 95 is optional.  Expanded coverage during PHE for most/standard Commercial plans.

Type of Service	What is the Service?	HCPCS/CPT Code	Coding & Helpful Information
Dialysis Service	A Dialysis, ESRD, or CKD service	• 90935, 90937	Use POS 02.
End Stage Renal Disease (ESRD) Service Chronic Kidney Disease (CKD) Service	with the use of telecommunication systems between a provider and a patient.	<ul> <li>90945, 90947</li> <li>90951 – 90962</li> <li>90963 – 90966</li> <li>90967 – 90970</li> <li>90989, 90993</li> <li>G0420, G0421</li> <li>G0492</li> </ul>	Modifier 95 is optional.
Other miscellaneous services	Services performed with the use of telecommunication systems between a provider and a patient.	<ul> <li>93750, 95970, 95971, 95972, 95983, 95984</li> <li>G0337</li> <li>H2000</li> <li>S0257, S0260</li> <li>T1001</li> <li>T1024</li> </ul>	Use POS 02.  Modifier 95 is optional.
Cardiac or Pulmonary Rehab	Cardiac or Pulmonary rehabilitation performed with the use of telecommunication systems between a provider and a patient.	<ul><li>93797, 93798</li><li>G0422, G0423, G0424</li></ul>	Use POS 02.  Modifier 95 is optional.  CMS added expanded coverage during PHE, and this was added to Commercial also.
Remote patient monitoring	These remote patient monitoring services are not considered telehealth services.  In general, these services are covered (subject to basic medical necessity criteria) under the member's regular medical benefits.	<ul> <li>92227 - 92228</li> <li>93228 - 93229</li> <li>93268 - 93272</li> <li>99091</li> <li>99453 - 99454</li> <li>99457 - 99458</li> </ul>	Do not use POS 02. POS based on patient location.  Use of modifier 95 not appropriate beginning 1/1/2020.

# **Modifier Definitions:**

Modifier CS is shown below. For a list of the remainder of telehealth modifiers, please see "Telehealth and Telemedicine Services." Moda Health Reimbursement Policy Manual, RPM052.

Modifier	Modifier Description
Modifier CR	Catastrophe/disaster related
Modifier CS	Covid-19 testing related service

# Diagnosis codes (ICD-10):

Code	Code Description			
B97.21	SARS-associated coronavirus as the cause	SARS-associated coronavirus as the cause of diseases classified elsewhere		
B97.29	Other coronavirus as the cause of diseases classified elsewhere  For confirmed cases of COVID-19 for DOS 3/31/2020 and earlier			
U07.1	COVID-19 [acute respiratory disease] Effective for DOS 4/1/2020 and following (CDC <sup>1</sup> )			
Z03.818	Encounter for observation for suspected exposure to other biological agents ruled out			
Z20.828	Contact with and (suspected) exposure to other viral communicable diseases			

# Place of Service code:

Code	Short Description	Place of Service Code Long Description
02	Telehealth	The location where health services and health related services are provided or received, through telecommunication technology.
		(Does not apply to originating site facilities billing a facility fee.)

## Condition code:

Condition Code	Condition Code Description	
DR	Disaster related	

# **External Links & Coding Resources**

AAPC. <u>"Coronavirus: What Every Medical Coder Needs to Know."</u> Last updated March 16, 2020; Last accessed March 26, 2020.

AMA. <u>"Special coding advice during COVID-19 public health emergency."</u> Includes coding scenarios.

CDC. <u>"ICD-10-CM Coding encounters related to COVID-19 Coronavirus Outbreak."</u> (Applies for dates of service March 31, 2020 and prior.)

For a list of telehealth services covered under Medicare, see:

https://www.cms.gov/Medicare/Medicare-General-Information/Telehealth/Telehealth-Codes.

For additional information about CMS changes and COVID-19 telehealth expansion, see:

https://www.cms.gov/files/document/covid-19-physicians-and-practitioners.pdf
https://www.cms.gov/outreach-and-educationoutreachffsprovpartprogprovider-partnership-email-archive/2020-03-31-mlnc-se

List of links about CMS Coronavirus Waivers & Flexibilities: <a href="https://www.cms.gov/about-cms/emergency-preparedness-response-operations/current-emergencies/coronavirus-waivers">https://www.cms.gov/about-cms/emergency-preparedness-response-operations/current-emergencies/coronavirus-waivers</a>

For a list of telehealth services covered under Medicaid/EOCCO, see:

https://www.eocco.com/eocco/-/media/eocco/pdfs/providers/eocco-medicaid-telemedicine-overview.pdf

## **Cross References**

"Telehealth and Telemedicine Services." Moda Health Reimbursement Policy Manual, RPM052.

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- Wiki. "Public Health Emergency of International Concern." Last updated March 23, 2020; Last accessed March 25, 2020. <a href="https://en.wikipedia.org/wiki/Public Health Emergency of International Concern">https://en.wikipedia.org/wiki/Public Health Emergency of International Concern</a>
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## **Background Information**

The SARS-CoV-2 virus is a coronavirus that causes the disease COVID-19. (WHO<sup>5</sup>) The initial outbreak was identified in Wuhan, Hubei Province, China and later spread internationally. (CDC<sup>6</sup>) The World Health Organization (WHO) declared the outbreak a Public Health Emergency of International Concern on January 30, 2020. (WHO<sup>7</sup>) Then on March 11, 2020 the WHO declared COVID-19 a pandemic. (Ducharme<sup>8</sup>) The Centers for Disease Control and Prevention (CDC) leads the U.S. response. The World Health Organization (WHO) guides the global response. (OHA<sup>9</sup>)

The Coronavirus Preparedness and Response Supplemental Appropriations Act, as signed into law by the President on March 6, 2020, includes a provision allowing the Secretary of the Department of Health and Human Services to waive certain Medicare telehealth payment requirements during the Public Health

Emergency (PHE) declared by the Secretary of Health and Human Services January 31, 2020 to allow beneficiaries in all areas of the country to receive telehealth services, including at their home. (CMS¹)

#### **IMPORTANT STATEMENT**

The purpose of this Reimbursement Policy is to document Moda Health's payment guidelines for those services covered by a member's medical benefit plan. Healthcare providers (facilities, physicians and other professionals) are expected to exercise independent medical judgment in providing care to members. Moda Health Reimbursement Policy is not intended to impact care decisions or medical practice.

Providers are responsible for accurately, completely, and legibly documenting the services performed. Billed codes shall be fully supported in the medical record and/or office notes. Providers are expected to submit claims for services rendered using valid codes from HIPAA-approved code sets. Claims are to be coded appropriately according to industry standard coding guidelines (including but not limited to UB Editor, AMA, CPT, CPT Assistant, HCPCS, DRG guidelines, CMS' National Correct Coding Initiative [CCI] Policy Manual, CCI table edits and other CMS guidelines).

Benefit determinations will be based on the member's medical benefit plan. Should there be any conflicts between the Moda Health Reimbursement Policy and the member's medical benefit plan, the member's medical benefit plan will prevail. Fee determinations will be based on the applicable provider fee schedule, whether out of network or participating provider's agreement, and Moda Health Reimbursement Policy.

Policies may not be implemented identically on every claim due to variations in routing requirements, dates of processing, or other constraints; Moda Health strives to minimize these variations.

\*\*\*\*\* The most current version of our reimbursement policies can be found on our provider website. If you are using a printed or saved electronic version of this policy, please verify the information by going to https://www.modahealth.com/medical/policies reimburse.shtml \*\*\*\*\*