

CURRENT AS OF: March 31, 2020

A PROVIDER'S GUIDE:

Telehealth Reimbursement Coverage in Hawaii During COVID-19

Rapid developments with the COVID-19 pandemic have resulted in a set of broad expansions of telehealth policy, including key changes to both public and private payer payment policies, at least for the duration of this emergency period. These changes include a CMS waiver dramatically broadening Medicare telehealth payment policies under [HR 6074](#), enacted March 17, 2020; [HR 748](#), enacted March 27, 2020; and federal action to periodically waive enforcement of HIPAA sanctions.

This guide is meant to help healthcare providers and organizations get up to speed quickly on these changes and key components of telehealth payment in Hawaii. Please keep in mind that events and policies are changing rapidly, and that this document will be updated frequently as new information and policies become available/are enacted. The table below synthesizes where policies currently stand for Medicare fee-for-service, Med-QUEST, and commercial carriers in Hawaii.

Key Policy Considerations	Medicare	Med-QUEST (Medicaid)	Private Payers
NO geographic limitations for telehealth services (e.g. service <i>not</i> limited to rural or non-Metropolitan Svc Area (MSA) location)	Yes	Yes Act 226 (16)	Yes Act 226 (16)
Out of state providers allowed	Yes 1135 Waiver	Confirming with MQD	Yes Supplementary Proclamation
Patient home is eligible "originating site" (i.e. patient site)	Yes	Yes Act 226 (16)	Yes Act 226 (16)
Other non-healthcare facilities (e.g. schools, worksites, libraries, etc.) are eligible originating/patient sites	Yes	Yes Act 226 (16)	Yes Act 226 (16)
Originating/patient sites (other than patient's home) can bill facility fee	Rural: Yes Urban/MSA*/home: No	Confirming with MQD	No Varies by Payer
Prior existing relationship with patient required	No HR 748	No Executive Order 20-02	No Executive Order 20-02

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Any provider type eligible to use telehealth, as long as practicing within scope (e.g. MD, DO, NP, APRN, PT, OT, LCSW, RD/LD, etc.)	No Eligible Providers only	Confirming with MQD	Varies by Payer
DEA-registered practitioners may issue prescriptions for controlled substances without requiring in-person medical evaluation	Yes See conditions	Yes Not opiates, medical cannabis, HRS 453-1.3(c)	Yes Not opiates, medical cannabis, HRS 453-1.3(c)
Any eligible member service can be provided via telehealth when medically necessary and appropriate	No Eligible Services only	Yes Eligible Services	Yes Varies by Payer
Patient co-pays and out-of-pocket still apply unless waived by the payer/plan	Yes	Yes	Yes
Prior authorization NOT required for telehealth services, unless in-person service also requires prior authorization	Yes	Yes	Yes Varies by Payer
Providers can use all telehealth modalities to deliver services (live video, store-and-forward, remote patient monitoring)	Yes	Yes	Yes
Providers paid for telephone/audio only visits	Yes Virtual Check-ins, eConsults	Yes Virtual Check-ins, eConsults	Yes^{2,3} Virtual Check-ins
Providers can deliver services via technology-based communications that are not typically considered telehealth – i.e. virtual check-ins, interprofessional internet consultations (eConsults), remote monitoring services (CCM, Complex CCM, TCM, Remote PM, PCM), online digital evals (see CCHP Telehealth Policies for specific codes and criteria)	Yes Virtual Check-ins G2010, G2012 G0071 (FQHCs) eConsults 99446-99449, 99551-99452 e-Visits 99421-99423 G2061-G2063	Yes Virtual Check-ins G2010, G2012 eConsults 99446-99449, 99451-99452, 99091 e-Visits 99421-99423 G2061-G2063 Remote Mon. 99453, 99454, 99457, 99458	Yes^{2,3} Virtual Check-ins, e-Visits Varies by Payer

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Patient consent is required, however verbal consent is acceptable (i.e. written consent not required)	Yes	Yes	Yes ² Varies by Payer
Non-HIPAA compliant technology solutions are acceptable to use for telehealth visits (e.g. Skype, FaceTime) – see OCR guidance for additional detail	Yes	Yes	Yes Varies by Payer
Personal devices, such as smartphones and tablets may be used to deliver telehealth services	Yes	Yes	Yes
Modifiers to be used for telehealth services:	POS 02 Synch Modifier GT (CAH Method II) No modifier for other Synch Asynch Modifier GQ	POS 02 Synch Modifier GT Asynch Modifier GQ CDT Modifier D9995 (Synch) D9996 (Asynch)	POS 02 Synch Modifier GT, 95 ^{1,3} Asynch Modifier GQ Varies by Payer
Special Considerations for FQHCs and RHCs			
Federally Qualified Health Centers (FQHCs) and Rural Health Centers (RHCs) may serve as “distant” telehealth sites (i.e. provider location sites)	Yes HR 748	Yes Memo QI-2007 Memo QI-2008 Memo QI-2010	Yes Varies by Payer
FQHCs and RHCs can utilize some technology-based communications, per 2019 Medicare expansion	Virtual Check-in: G0071 Remote Monitoring Services: Chronic Care Management (CCM); Transitional Care Management (TCM)		

*Metropolitan Statistical Area

¹ HMSA Policy: https://hmsa.com/portal/provider/MM.12.027_Telehealth_Services_010119.pdf² HMSA COVID-19 Telehealth FAQs: <https://prc.hmsa.com/s/relatedlist/ka03m0000015T3cAAE/AttachedContentDocuments>³ UHC Policy: <https://www.uhcprovider.com/en/resource-library/news/Novel-Coronavirus-COVID-19.html>

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Telehealth Policy Resources:

- [Medicare Learning Network Booklet – Telehealth Services \(2019\)](#)
- [Medicare Telemedicine Health Care Provider Fact Sheet](#)
- [Telehealth Coverage Policies in the Time of COVID-19 – Center for Connected Health Policy](#)
- [Billing for Telehealth Encounters: An Introductory Guide to Fee-for-Service – Center for Connected Health Policy](#)
- [Act 226 \(16\) – Relating to Telehealth](#)
- [State of Hawai'i Supplemental Emergency Proclamation \(March 16, 2020\)](#)
- [State of Hawai'i Executive Order 20-02 \(March 29, 2020\)](#)

Telehealth Training and Other Relevant Resources:

- [PBTRC COVID-19 Telehealth Resource Page](#) – Pacific Basin TRC
- [Telehealth Best Practices Video \(4 mins\)](#) – Hawaii Department of Health
- [A Physicians Guide to COVID-19](#) – American Medical Association
- [Telehealth and COVID-19 Toolkit](#) – National Consortium of Telehealth Resource Centers
- [Telehealth Coordinator eTraining](#) – California TRC and Northeast TRC

Questions? Contact the [Pacific Basin Telehealth Resource Center \(PBTRC\)](#):

Email: pbtrc@uhtasi.org or via our website: <http://www.pbtrc.org/contact-us>

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