2023 TELEHEALTH VIRTUAL VISIT REIMBURSEMENT GUIDE

This information or content and conclusions are those of the author and should not be construed as the official position of policy of, no should any endorsements be inferred by HRSA, HHS, or the U.S. Government.





This document is intended as a guide to assist providers in obtaining information on telehealth reimbursement. This document does not constitute legal advice. Many factors affect the appropriateness of submitting a particular claim for reimbursement. The information should be used in consultation with your billing specialist and other advisers in initiating telehealth billing.

Reimbursement information can become outdated quickly and is subject to change without notice. We recommend review of this material on a regular basis to assure the information is up to date. Please visit www.pbtrc.org to download the latest version. PBTRC does not guarantee payment for any service.

The Pacific Telehealth Resource Center is a prominent source of comprehensive knowledge on the development and operation of telemedicine and telehealth programs. PBTRC focuses on telehealth expansion and working through all areas of the community to connect those in need of telehealth support or information.

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INTRODUCTION & SUMMARY OF CHANGES

Disclaimer: Although the data found here has been produced and processed from payor sources believed to be reliable, no warranty expressed or implied is made regarding accuracy, adequacy, completeness, legality, reliability, or usefulness of any information.

INTRODUCTION

Many changes for telehealth coverage have occurred since the COVID-19 Public Health Emergency (PHE) was declared on January 31st, 2020 including the many updates that CMS provided at the beginning of March 2020. The continuous changes have allowed for telehealth expansion at an accelerated pace while also making it complex for providers and staff to understand the requirements in order to bill for telehealth services.

The Pacific Basin Telehealth Resource Center (PBTRC) has developed this informational billing guide to assist with those who have any questions concerning telehealth billing. This guide will review common terms, and policies from Medicare, Medicaid (Hawaii MedQuest), and our local commercial payers. The purpose of this guide is to provide guidance to:

- Telehealth billing (CPT codes, modifiers, POS, and other information to assist with reimbursement)
- Payer-specific policies/procedures
- Documentation requirements
- Software solutions
- Overview of bills or state-level changes that impact telehealth coverage/billing

This guide will review the permanent policies that each payer has enacted as well as provide guidance now that the PHE ended on May 11th, 2023. Since the news of the PHE ending, many payers have provided end dates to copay waivers or have stated that coverage will extend through the end of the calendar year. Some payers have come out with more stringent policies as it relates to what is covered, for a summary of all changes, refer to the next section. Please note that this information changes rapidly, we will continue to work on this guide and update it as new changes come out, including with the annual updates per Medicare guidelines that is published each November.



SUMMARY OF CHANGES

May 2023 Changes:

Section	Subsection (If Applicable)	Changes
Notice		 Added in clarifying position about information presented in the guide
Introduction		 Updated introduction section overview Defining PHE end date Update to overview of what is including in the document
Common Regulatory Terms		 Originating site 'note' describing changes now that the PHE has ended Eligible provider definition per Medicare Hawaii criteria for eligible providers- related to previous telehealth bills in place prior to PHE



Section	Subsection (If Applicable)	Changes
	Telehealth	 Reporting criteria (audio- only & HIPAA-secure software) Documentation requirements (HIPAA- compliant software) Note on POS codes
	Virtual Check-Ins	 Reporting criteria (established patient & HIPAA-secure software) Documentation requirements (HIPAA- compliant software)
Visit Types	E-Visits	 Reporting criteria (established patient & HIPAA-secure software) Documentation requirements (HIPAA- compliant software)
	Telephone Visits	 Reporting criteria (established patient & HIPAA-secure software) Audio-only POS Note
	Remote Patient Monitoring	 Reporting criteria (established patient & HIPAA-secure software) Note regarding expanded coverage per CMS ending RTM codes
	Specialty Consults (eConsults)	NO CHANGES



Section	Subsection (If Applicable)	Changes
Specific Visit Type Guidance	Annual Wellness Visits	 Updates related to explanation when elements cannot be completed through telehealth; removal of the wording "could not be completed due to COVID-19".
	EPSDT Visits	 Note on lack of coverage from MedQuest Most of the section removed for document clarity purposes
Payor Matrix		UPDATES ARE IN GREEN IN THE CORRESPONDING BOXES
Payor Specific Guidance	Aetna	 POS 10 for Medicare Advantage Covered CPT codes Patient Type/Other info boxes Virtual check-in Codes Platform suggestions Note on policy wording related to commercial coverage post-PHE
	AlohaCare	 Updated telephone coverage to match MedQuest's new policy Updated note on policy changes; no others noted at this time

Section	Subsection (If Applicable)	Changes
	Cigna	 E-Visit codes and coverage update
	HMSA	 Updated policy link Updated coverage for commercial plans Remove of eVisit codes Added RPM codes
	Humana	• Removal of E-Visit codes
Payor Specific Guidance	Medicaid (Hawaiʻi MedQuest)	 Changes to reflect policies in place pre-PHE New policy introduced for audio-only behavioral health
	Medicare	 Notate about coverage through 2024 Software HIPAA- compliance
	Ohana (Wellcare)	 Removal of eVisit codes Addition to phone codes and note related to coverage circumstances aligning with MedQuest
	United HealthCare	 Note on when telephone only is covered Update on audio-only coverage
Cost Sharing Waivers		SECTION WAS REMOVED, AS WAIVERS APPLIED TO COVID-19 AND THE PHE.



Section	Subsection (If Applicable)	Changes
	Rural Health Clinics (RHCs)	 Distant site expansion through 2024 Updates on coverage dates Cost sharing information removed Updated telephone coverage
Telehealth Guidelines by Facility Type	Federally Qualified Health Centers (FQHCs)	 Distant site expansion through 2024 Updates on coverage dates Updated telephone coverage Removal of MedQuest policies that expired Cost sharing information removed
	Physical, Occupational, Speech Therapy	 Updated policies/coverage by payer including CPT codes. Payers with updated information: Humana, HMSA, Medicare, United Healthcare CAA expansion on qualifying providers through 2024

Section	Subsection (If Applicable)	Changes
Billing Scenarios		 Removal of diagnosis code recommendations that relate to COVID-19 diagnosis for each scenario
HIPAA Compliant Software		 Introduction section 90-day transitional period to allow for implementation of secure technologies post-PHE
Coverage in Hawai'i Beyond COVID-19		 Title of the section Geographical limitations Out of state providers Originating site Facility fee Prior relationship Opioid prescribing Copays and out of pocket line removed Audio-only Tech-based communication Non-compliant software line removed Own device line removed Modifiers and POS removed FQHC/RHC Section removed (redundant material Overview of Policy QI-2306; Real-time Audio Interaction Policy After PHE





Section	Subsection (If Applicable)	Changes
Acronyms		 New section listing all acronyms in this document
References & Resources		 Addition of new resources/embedded documents for policy changes Added dates on links for new references



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COMMON Regulatory Terms

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COMMON REGULATORY TERMS

Term	Description
	Originating Site is where the patient is located when the telehealth interaction takes place. In Medicare, it is limited to both geographically and by the specific site a patient is located in at the time of the telehealth interaction (i.e. home, school, other physician's office).
Originating Site	<u>Note:</u> The PHE allowed for flexibilities for providers to see patients across state lines, now that the PHE has ended, many states have rolled back these rules and require either a license in the state that the patient is located or participation in the interstate compact for those states that are participating.
Distant Site	Distant Site is a site where a health care provider who provides healthcare services is located while providing these services via a telecommunications system. The distant site can be different from the administrative location. This allows the provider to be in a location suitable to telehealth encounters but not necessarily in a clinic or facility. Medicare guidance does stipulate that the provider cannot be physically located outside of the United States when providing healthcare services.



Term	Description
Eligible Providers	Using the Medicare definition, there are limits to the type of providers who can provide a service. Those providers include: Physicians, Nurse Practitioners (NPs), Physician Assistants (PAs), Nurse-midwives, Clinical nurse specialists (CNSs), Certified registered nurse anesthetists, Clinical psychologists (CPs) and clinical social workers (CSWs), Registered Dietitians (RDs) or nutrition professionals. According to the Consolidated Appropriations Act (CAA), PT/OT/ST can continue to utilize telehealth through December 31, 2024. In the previous guidance direct from Medicare, it would allow billing up to 151 days after the PHE ended, CAA extended this flexibility.
Hawai'i Criteria for Eligible Providers	Bill §346-59.1 related to 'Coverage of Telehealth' defines healthcare provider as the following: means a provider of services, as defined in title 42 United States Code section 1395x(u), a provider of medical and other health services, as defined in title 42 United States Code section 1395x(s), other practitioners licensed by the State and working within their scope of practice, and any other person or organization who furnishes, bills, or is paid for health care in the normal course of business, including but not limited to primary care providers, mental health providers, oral health providers, physicians and osteopathic physicians licensed under chapter 453, advanced practice registered nurses licensed under chapter 457, psychologists licensed under chapter 465, and dentists licensed under chapter 448.

Coding Terminology

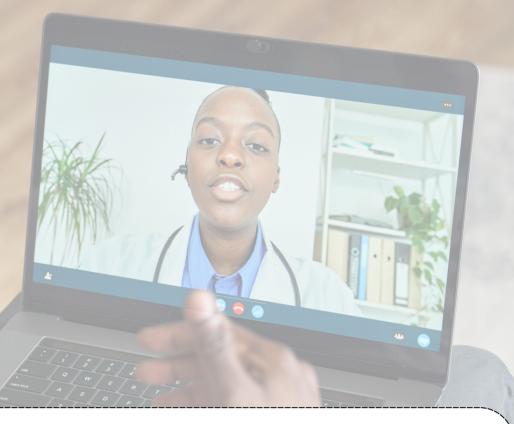
Term	Description
	Common Procedural Terminology (CPT) codes are defined as a uniform language for coding medical services and procedures. All CPT codes are 5 digits and can either be alphanumeric or numeric depending on their associated category.
Category I	These codes have descriptors that correspond to a procedure/service. Codes range from 00100- 99499 and are generally ordered into subcategories based on the procedure or service type as well as anatomy.
Category II	These are alphanumeric tracking codes that are supplemental and used for performance measurement. These are not related to correct coding. The primary use for these codes are reporting quality improvement measures to payors.



Term	Description
Category III	 These codes are temporary alphanumeric codes for new and developing technology, procedures and services. They were created for data collection, assessment and in some instances, payment of new services and procedures that currently don't meet the criteria for a Category I code. Modifiers: Modifiers are two-digit numbers, two-character modifiers, or alpha-numeric indicators. Modifiers provide additional information to payers to make sure your provider gets paid correctly for services rendered. More than one modifier may be used with a single procedure code; however, they are not applicable for every category of the CPT codes. Some modifiers can only be used with a particular category and some are not compatible with others. GO (zero): Used to identify telehealth services furnished for purposes of diagnosis, evaluation, or treatment of symptoms of an acute stroke GQ: Only used in Alaska and Hawaii. Asynchronous telemedicine services rendered via a real-time interactive audio and video telecommunications system. This is no longer a recognized modifier, though some private payers still use and prefer the GT modifier. 95: Synchronous telemedicine services rendered via a real-time interactive audio and video telecommunications system. Managed care and private plan policies vary on what modifier they require in order to bill for telehealth (GT or 95).

Term	Description
Evaluation & Management Codes	This category of CPT codes, primarily outpatient 'office visit", are used for telehealth, as opposed to having a separate code solely describing a telehealth E/M service. The updated guidelines were announced in 2019 for implementation in 2021. The 2021 Outpatient E/M Guidelines allow providers to bill CMS and private payors based on time or medical decision making (MDM). The CPT codes affected are: 99202-99215, only 99201 was deleted.
Non-Telehealth Technology Services	 Communication Technology Based Services (CTBS) CTBS are represented by CPTs that describe technology-based services but are not labeled "telehealth" by CMS. Because of this, providers may bill and get reimbursed for them even if the patient is at home or if they live in a city. The CPT codes do not require a modifier and the POS should reflect the location of where the provider normally practices medicine or provides patient care during the provision of the service.
Remote Evaluation & Virtual Check-In	These CTBS codes were introduced in 2019 to reimburse providers for a review of an image or for a brief conversation with their patients. Following that introduction, CMS noted in the 2020 final rule that the CTBS should be patient- initiated (for example the patient calls in and the provider calls them back).
Care Management (CM) Codes	This category of CPT codes relates to services that do not involve direct or face-to-face (F2F) patient discussion or care but are important in caring for simple or complex medical conditions.





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VISIT TYPES

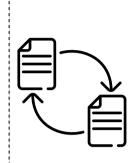
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TELEHEALTH

Definition

There are three types of telehealth services:



Asynchronous Telehealth (Store & Forward): Transfer of digital images, sounds, or previously recorded video from one location to another to allow a consulting practitioner (usually a specialist) to obtain information, analyze it, and report back to the referring practitioner. This is a non-interactive telecommunication because the physician or health care practitioner views the medical information without the patient being present.

<u>Synchronous Telehealth:</u>



Real-time interactive video teleconferencing that involves communication between the patient and a distant practitioner who is performing the medical service. The practitioner sees the patient throughout the communication, so that two-way communication (sight and sound) can take place.

<u>Remote Patient Monitoring:</u>



Use of digital technologies to collect health data from individuals in one location and electronically transmit that information to providers in a different location for assessment. Though not technically a telehealth code/definition, RPM is utilized in many telehealth settings and is a progressive way to monitor patients outside of the clinic setting.

CPT/HCPCS CODES

Telehealth eligible CPT/HCPCS codes vary by payor (refer to Payor Guidelines section for each payor's policies.

Place of Service Codes

POS 02: Telehealth Provided Other than in Patient's Home*	 The location where health services and health related services are provided or received, through telecommunication technology. Patient is not located in their home when receiving health services or health related services through telecommunication technology. Note-Renamed on January 1st, 2022, previously was only called "Telehealth"
POS 10: Telehealth Provider in Patient's Home (Effective January 1st, 2022)	 The location where health services and health related services are provided or received through telecommunication technology. Patient is located in their home (which is a location other than a hospital or other facility where the patient receives care
POS 11: Office	 Location, other than a hospital, skilled nursing facility (SNF), military treatment facility, community health center, State or local public health clinic, or intermediate care facility (ICF), where the health professional routinely provides health examinations, diagnosis, and treatment of illness or injury on an ambulatory basis.





Note: Most payers have reverted to original telehealth POS coding to ensure that they capture the right information. During the PHE, this was waived to allow for regular office visit coding to ensure payment for telehealth services matched that of in-office visits. We recommend ensuring POS accurately reflect telehealth moving forward for accurate claim reimbursement.

Reporting Criteria



Communication must be performed via live two-way interaction with both video and audio.



HIPAA compliant platform software must be utilized. Refer to the HIPAA Compliant section for more details. Report the appropriate E/M code for the professional service provided.

-

Please refer to each payer guideline to ensure audio-only is covered, if that is the only option available for the patient (many have eliminated coverage after PHE end date).



Documentation Requirements

Documentation Requirements are the **<u>same as a face-to-face</u> <u>encounter</u>**.



<u>Visit Details:</u>

Information on: date of service, visit synopsis, history, review of systems, consultative notes, diagnosis/impression, interventions and care plan.



Consent:

Confirm/document patient's consent for this service; consent to bill for service.



Technology:

Statement that the service was provided using telemedicine/ Mode of transmission.



Telemedicine Details:

Need for telemedicine; location of provider, location of patient; names/roles of those particpating in encounter (e.g. caregiver, patient); time spent discussing with patient.



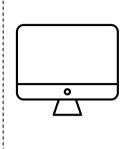
Billing:

Procedural codes/POS 10 /11 or 02 + necessary modifiers based on health plan.



E-VISIT

Definition



Online Digital Evaluation and Management Services (E-Visits): E/M service provided by a Qualified Healthcare Professional or an assessment provided by a Qualified Nonphysician Healthcare Professional to a patient using an audio and visual software-based

Reportable by Qualified

communication, such as a patient portal.

CPT/HCPCS CODES

Reportable by a Qualified Healthcare Professionals:	Nonphysician Healthcare Professionals (PT, OT, Speech Language Pathologists, Clinical Psychologists Registered Dietitian, etc.):
99421: Online digital	G2061/98970: Qualified nonphysician
evaluation and management	healthcare professional online
service, for an established	assessment, for an established
patient, for up to 7 days,	patient, for up to seven days,
cumulative time during the 7	cumulative time during the 7 days; 5-
days; 5-10 minutes.	10 minutes.
99422: Online digital	G2062/98971: Qualified nonphysician
evaluation and management	healthcare professional online
service, for an established	assessment, for an established
patient, for up to 7 days,	patient, for up to seven days,
cumulative time during the 7	cumulative time during the 7 days; 11-
days; 11-20 minutes.	20 minutes.
99423: Online digital	G2063/98972: Qualified nonphysician
evaluation and management	healthcare professional online
service, for an established	assessment, for an established
patient, for up to 7 days,	patient, for up to seven days,
cumulative time during the 7	cumulative time during the 7 days; 21
days; 21 or more minutes.	or more minutes.

E-VISIT CONT.

Reporting Criteria



The patient must be established. During the COVID-19 pandemic Medicare and some other payors have waived this requirement, Medicare reinstated the need for establishment after the PHE end date.



Cannot report when service originates from a related E/M service performed/reported within the previous 7 days, or for a related problem within a postoperative period.



The 7-day period begins when the physician personally reviews the patient's inquiry.



Online visits must be initiated by the patient. However, practitioners can educate beneficiaries on the availability of e-visits prior to patient initiation.



E-Visit codes can only be reported once in a 7-day period.



E-Visits are reimbursed based on time.



Time counted is spent in evaluation, professional decision making, assessment and subsequent management.





E-VISIT CONT.

Reporting Criteria Cont.

Time is accumulated over the 7 days and includes time spent by the original physician and any other physicians or other qualified health professionals in the same group practice who may contribute to the cumulative service time.



Does not include time spent on non-evaluative electronic communications (scheduling, referral notifications, test result notifications, etc.). Clinical staff time is also not included.

Documentation Requirements



<u>Visit Details:</u>

Date of service; Confirmation of patient identity and documentation in note; Detailed communication of what occurred (patient problems, progress on care plan/barriers); remote evaluation; prescriptions; this visit is not for scheduling appointments or conveying test results.



Consent:

Confirm/document patient's consent for this service; consent to bill for service.

Documentation Requirements Cont.



Technology:

Statement that the service was provided using mode of transmission.

Telemedicine Details:



Need for telemedicine services; Mode of transmission; Document the nature of the call was not tied to a F2F visit or procedure that occurred within the last 7 days; Document that a subsequent office visit within 24 hours or next available were not indicated.



Billing:

Procedural codes/POS 10 /11 or 02



VIRTUAL CHECK-IN

Definition



Virtual Check-in: A brief check in between a practitioner and a patient via telephone or other audiovisual device to decide whether an office visit or other service is needed. A remote evaluation is recorded video and/or images submitted by an established patient.

CPT/HCPCS CODES

Virtual Check-Ins	Remote Assessment/Brief Communication
G2012: Brief communication technology-based service, e.g. virtual check-in, by a physician or other qualified health care professional who can report evaluation and management services, provided to an established patient, not originating from a related E/M service provided within the previous 7 days nor leading to an E/M service or procedure within the next 24 hours or soonest available appointment; 5-10 minutes of medical discussion.	G2250: Remote assessment of recorded video and/or images submitted by an established patient (e.g., store and forward), including interpretation with follow-up with the patient within 24 business hours, not originating from a related service provided within the previous 7 days nor leading to a service or procedure within the next 24 hours or soonest available appointment.

CPT/HCPCS CODES CONT.

Virtual Check-Ins	Remote Assessment/Brief Communication
C2010: Demote evolution of	
G2010: Remote evaluation of	G2251: Brief communication
recorded video and/or images	technology-based service, e.g.
submitted by an established	virtual check-in, by a qualified
patient (e.g., store and forward),	health care professional who
including interpretation with	cannot report evaluation and
follow-up with the patient within	management services, provided
	to an established patient, not
from a related E/M service	originating from a related service
provided within the previous 7	provided within the previous 7
days nor leading to an E/M service	
or procedure within the next 24	procedure within the next 24
hours or soonest available	hours or soonest available
appointment.	appointment; 5?10 minutes of
	clinical discussion.
	G2252: Brief communication
	technology-based service, e.g.
	virtual check-in, by a physician or
	other qualified health care
	professional who can report
	evaluation and management
	services, provided to an
	established patient, not
	originating from a related e/m
	service provided within the
	previous 7 days nor leading to an
	e/m service or procedure within
	the next 24 hours or soonest
	available appointment; 11-20
	minutes of medical discussion



CPT/HCPCS CODES

Virtual Check-Ins	Remote Assessment/Brief Communication
	G0071: Payment for communication technology- based services for 5 minutes or more of a virtual (non-face-to- face) communication between an rural health clinic (RHC) or federally qualified health center (FQHC) practitioner and RHC or FQHC patient, or 5 minutes or more of remote evaluation of recorded video and/or images by an RHC or FQHC practitioner, occurring in lieu of an office visit; RHC or FQHC only.



Reporting Criteria



Communication must be a direct interaction between the patient and the practitioner. Not billable if performed by clinical staff.



If the virtual check-in leads to an E/M within the next 24 hours or soonest available appointment, then the service is considered bundled into the pre-visit time of the associated E/M and would not be separately billable. The patient must be established. During the COVID-19 pandemic Medicare and some other payors have waived this requirement, Medicare reinstated the need for establishment after the PHE end date.



If the virtual check-in originates from a related E/M provided within the previous 7 days, then the service is considered bundled into that previous E/M and would not be separately billable.





Documentation Requirements



<u>Visit Details:</u>

Date of service; Confirmation of patient identity and documentation in note; Detailed communication of what occurred (patient problems, progress on care plan/barriers); remote evaluation; prescriptions; this visit is not for scheduling appointments or conveying test results.



Consent:

Confirm/document patient's consent for this service; consent to bill for service.



Technology:

Statement that the service was provided using mode of transmission.



Telemedicine Details:

Need for telemedicine services; Mode of transmission; Document the nature of the call was not tied to a F2F visit or procedure that occurred within the last 7 days; Document that a subsequent office visit within 24 hours or next available were not indicated.



<u>Billing:</u> Procedural codes/POS 10 /11

TELEPHONE

<u>Definition</u>



<u>Telephone:</u>

A telephone visit is an evaluation and management service provided by a qualified healthcare professional or an assessment and management service provided by a qualified nonphysician health care professional via audio telecommunication.

Important Tip: According to CMS, these visit types are for an established patient only. The home is the eligible 'originating site'. There must have been a six-month in-person item or service provided, a 12-month subsequent in-person visit. Provider has capability to provide live video but is utilizing audio-only because patient chose or cannot use live video. A service level modifier will be created for these visits and the provider will need to document in the patient record why audio-only was used.





TELEPHONE CONT.

CPT/HCPCS CODES

Reportable by a Qualified Healthcare Professionals:

Reportable by Qualified Nonphysician Healthcare Professionals (PT, OT, Speech Language Pathologists, Clinical Psychologists Registered Dietitian, etc.)*:

99441: Telephone evaluation and	98966: Telephone assessment
management service by a	and management service
physician or other qualified health	provided by a qualified
care professional who may report	nonphysician health care
evaluation and management	professional to an established
services provided to an	patient, parent, or guardian not
established patient, parent, or	originating from a related
guardian not originating from a	assessment and management
related E/M service provided	service provided within the
within the previous 7 days nor	previous 7 days nor leading to an
leading to an E/M service or	assessment and management
procedure within the next 24	service or procedure within the
hours or soonest available	next 24 hours or soonest available
appointment; 5-10 minutes of	appointment; 5-10 minutes of
medical discussion.	medical discussion.
99442: 11-20 minutes of medical	98967: 11-20 minutes of medical
discussion.	discussion.
99443: 21-30 minutes of medical	98968: 21-30 minutes of medical
discussion.	discussion.

*Billing is intended for the following: non-physician health care professionals (e.g. psychologist, licensed clinical social worker, occupational therapist, physical therapist, speech therapist); intended for use by practitioners who cannot separately bill E&M services; and when the visit pertains to a service that falls within the benefit category of those practitioners.

TELEPHONE CONT.

Reporting Criteria



The patient must be established. During the COVID-19 pandemic Medicare and some other payors have waived this requirement, Medicare reinstated the need for establishment after the PHE end date.



If the call originates from a related E/M or assessment provided within the previous 7 days, then the service is considered bundled into that previous E/M or assessment and would not be separately billable.



Call must be initiated by the patient.



Communication must be a direct interaction between the patient and the healthcare professional.



If the call leads to an E/M or assessment within the next 24 hours or soonest available appointment, then the service is considered bundled into the previsit time of the associated E/M or assessment and would not be separately billable.





TELEPHONE CONT.

Documentation Requirements



Call Details:

Date of service; Confirmation of patient identity and those present on the call and documentation in note; Detailed communication of what occurred (patient problems, progress on care plan/barriers).



<u>Consent:</u>

Confirm/document patient's consent for this service; consent to bill for service.

Telemedicine Details:



Need for telemedicine services; Mode of transmission; Document the nature of the call was not tied to a F2F visit or procedure that occurred within the last 7 days; Document that a subsequent office visit within 24 hours or next available were not indicated.



Billing:

Procedural codes ; some payers require modifier 93 to indicate audio-only

Important Tip: According to Hawaii's MedQuest division, each phone call must provide documentation that relates to circumstances that prevented the visit form being face-to-face (patient is quarantined, state or federal guidelines that direct individuals to remain in their home, patient lives in a remote area that does not have access to internet, does not have access to telephone that has audio-visual functions or is unable to utilize those functions, etc.) must be documented.

REMOTE PATIENT MONITORING

<u>Definition</u>

Remote Patient Monitoring:



The use of digital technologies to monitor and capture medical and other health data from patients and electronically transmit this information to healthcare providers for assessment and, when necessary, recommendations and instructions. Also referred to as remote physiologic monitoring.

CPT/HCPCS CODES

99453: Remote monitoring 99091: Collecting and Analyzing of physiologic Physiologic Data: Collection and parameter(s) (e.g., weight, interpretation of physiologic data (e.g., blood pressure, pulse ECG, blood pressure, glucose monitoring) oximetry, respiratory flow digitally stored and/or transmitted by the rate), initial; set-up and patient and/or caregiver to the physician patient education on use or other qualified health care of equipment) is valued to professional, qualified by education, reflect clinical staff time training, licensure/regulation (when that includes instructing a applicable) requiring a minimum of 30 patient and/or caregiver minutes of time, each 30 day. The code about using one or more includes only professional work and does medical devices. Providing not contain any direct practice expense (PE). The valuation for CPT code 99091 Education and Set-up of includes a total time of 40 minutes of device: All auxiliary personnel (including physician or NPP work, broken down as clinical staff and nonfollows: 5 minutes of preservice work (for clinical) may provide example, chart review); 30 minutes of intra-service work (for example, data education to patients on RPM services and set up of analysis and interpretation, report based the device under this CPT upon the physiologic data, as well as a code.* possible phone call to the patient); and 5 minutes of post-service work (that is, chart documentation).





REMOTE PATIENT MONITORING CONT.

CPT/HCPCS CODES CONT.

99454: Continued Monitoring Over 16-days. Remote monitoring of physiologic parameter(s) (e.g., weight, blood pressure, pulse oximetry, respiratory flow rate), initial; device(s) supply with daily recording(s) or programmed alert(s) transmission, each 30 days) is valued to include the medical device or devices supplied to the patient and the programming of the medical device for repeated monitoring.	99457: Management Services for Initial 20 Minutes: Remote physiologic monitoring treatment management services, clinical staff/physician/other qualified healthcare professional time in a calendar month requiring interactive communication with the patient/caregiver during the month; first 20 minutes) and its add-on code.
	99458: Management Services for each Additional 20 Minutes: Remote physiologic monitoring treatment management services, clinical staff/physician/other qualified health care professional time in a calendar month requiring interactive communication with the patient/caregiver during the month; each additional 20 minutes (list separately in addition to code for primary procedure).

*CPT code 99453 can be billed only once per episode of care which "begin[s] when the remote physiologic monitoring service is initiated and ends with attainment of targeted treatment goals".

REMOTE PATIENT MONITORING CONT.

Important Tip: The above codes 99457/99458, can be billed for patients with acute and chronic conditions. The services can be ordered and billed only by physician and non-physician practitioners (nurse practitioners, physician assistants) who are eligible to bill Medicare for E/M Services. RPM services are not diagnostic tests and cannot be furnished or billed by an Independent Diagnostic Testing Facility. If more specific codes are available to describe the monitoring, then those codes should be utilized (for example, CPT code 95250 for continuous glucose monitory and CPT codes 99473 & 99474 for self-measured blood pressure monitoring.

CPT/HCPCS CODES

95250: is used for the technical	99473: can be used when a
component of CGM, and covers	patient receives education and
patient training, glucose sensor	training (facilitated by clinical
placement, monitor calibration,	staff) on the set-up and use of a
use of a transmitter, removal of	SMBP measurement device
sensor, and downloading of data.	validated for clinical accuracy,
CPT code 95250 may be	including device calibration.
appropriate for retrospective	99473 can only be reported once
CGM and for the initial training,	per device.
hookup, download, etc.	
	99474: can be used for SMBP data
	collection and interpretation
	when patients use a BP
	measurement device validated
	for clinical accuracy to measure
	their BP twice daily (two
	measurements, one minute apart
	in the morning and evening), with
	a minimum of 12 readings
	required each billing period.
	·



REMOTE PATIENT MONITORING CONT.

Note: Now that the PHE has ended, the below CMS temporary modifications to RPM requirements to enable individuals to receive care virtually during the PHE will come to an end. RPM services will once again only be provided to established patients. If your practice has implemented any procedures related to these modifications, we suggest reverting to original workflows until CMS makes permanent changes to reflect expansion in this area.

- New patients can receive RPM services without an in-person visit.
- Those who have contracted with a billing physician or practitioner to provide RPM services may obtain consent directly from individuals receiving care. Consent can also be obtained at the time services are provided.
- Monitoring days have been decreased from 16 to 2 allowing individuals who would benefit from shorter periods of monitoring to receive care. In many cases, short-term monitoring that traditionally occurs in-person can be provided virtually.

<u>Note</u>: Is related to Remote Therapeutic Data from a connected device; the allowed codes are as follows:

- Respiratory Monitoring (98976)
- Musculoskeletal Monitoring (98977)
- Cognitive Behavior Monitoring (989X6)

The above codes must be billed by qualified providers outside of physicians/NPP (E.g. PT, RD, and clinical psychologists). RTM reimbursement and requirements are generally aligned with RPM codes as discussed in this section: a device code (16 measurement-days required) and a 20-minute care management code.

REMOTE PATIENT MONITORING CONT.

Reporting Criteria



The patient must be established. During the COVID-19 pandemic Medicare and some other payors have waived this requirement, Medicare reinstated the need for establishment after the PHE end date.



Consent is required to be obtained prior to use of any RPM services.



Documentation of the device utilized.

Documentation Requirements

Each service has specific documentation requirements depending on what is being measured, at bare minimum the time spent, consent, data reviewed are required. Please refer to the clinical coverage policies of each payer to remain compliant with this service.



E-CONSULTS (SPECIALTY CONSULTS)

<u>Definition</u>



eConsults: An econsult is a modality in the field of telehealth that falls under the category of "store and forward." The primary care provider (or other continuity provider) initiates the econsult through a traditional referral pathway, ideally supported by clinical checklists. The specialist then gives advice or renders an opinion that the primary care provider (PCP) receives and acts on. An econsult can be as simple as a "curbside" opinion between the specialist and PCP that is intentionally general, but most econsults include signed, patient-specific clinical advice. Unlike a traditional consult, the patient does not have direct contact with the specialist at this point in the process. Oftentimes, the clinical question is answered solely via econsult, although the specialist will sometimes eventually see the patient in a face-to-face encounter. The rate of conversion to face-to-face depends on the clinical condition. When a face-to-face is required, only one visit will often be needed thanks to the pre-visit preparation completed via econsult.

CPT/HCPCS CODES

CF1/IICFC3 CODL3	
99446: written report with	99449: written report with
discussion, 5-10 minutes.	discussion, 31+ minutes. 31
"Interprofessional	minutes or more of medical
telephone/Internet/electronic	consultative discussion and
health record assessment and	review.
management service provided by	
a consultative physician including	
a verbal and written report to the	
patient's treating/requesting	
physician or other qualified health	
care professional; 5-10 minutes of	
medical consultative discussion	
and review".	
99447: written report with	99451: 5+ minutes.
discussion, 11-20 minutes. 11-20	Interprofessional
minutes of medical consultative	telephone/Internet/electronic
discussion and review.	health record assessment and
	management service provided by
	a consultative physician including
	a written report to the patient's
	treating/requesting physician or
	other qualified health care
	professional, 5 or more minutes of
	medical consultative time.
99448: written report with	99452: More than 16 minutes (PCP
discussion, 21-30 minutes. 21-30	code only). Interprofessional
minutes of medical consultative	telephone/Internet/electronic
discussion and review.	health record referral service(s)
	provided by a treating/requesting
	physician or qualified health care
	professional, 30 minutes.
1	·



Reporting Criteria



For codes 99446-99449, and 99451 the CPT definition specifically says consulting physician, not "or other qualified health care professional".



Treating physician/NP/PA requests the opinion and/or treatment advice of a physician with specific specialty expertise to assist in diagnosis or management of the patient's problem without seeing the patient.



These are not considered telehealth services yet they utilize the same technology. They use store/forward technology and not interactive, realtime, audio visual communication. Do not use POS 02 or modifier 95 when billing Medicare.



Following CPT rules, do not bill the above codes for services performed by a nurse practitioner or physician assistant.



May be a new or established patient to the consultant, for a new or existing problem.

Reporting Criteria Cont.

Consultant may not have had a face-to-face service with the patient in the last 14 days.



Majority of the time must be medical consultative verbal or internet discussion (greater than 50%).



99451 may be billed if more than 50% of the 5-minute time is data review and/or analysis.



May not bill if review leads to a faceto-face service with the patient in the next 14 days.



For 99446, 99447, 99448, 99449, if greater than 50% is in data review and/or analysis, do not bill those codes; according to CPT, this doesn't qualify.



Do not report these codes more than once in a 7-day period.



Reporting Criteria Cont.

Do not use for a transfer of care.



According to CMS, these codes are payable in both a facility and non-facility setting.



Use for time of 16-30 minutes in a service day preparing for the referral and/or communicating with the consultant.



If the patient is not present, may report non-face-toface prolonged codes if the time spent in the day exceeds 30 minutes.

Written or verbal request should be documented in the patient's medical record, including the reason for the consult.

-

Code 99452 may be reported by a physician, NP, PA.



May report face-to-face prolonged care codes with this service if an E/M service is also provided and the time exceeds 30 minutes beyond the typical time.



Documentation Requirements

Consent is required. Time spent is required to be documented and a written report.



<u>Meeting Details:</u>

Date of meeting; thorough report of what was discussed for the consult; confirm those in attendance.



Consent:

Confirm/document patient's consent for this service; consent to bill for service .



<u>Billing:</u> Procedural codes



SPECIFIC VISIT TYPE GUIDANCE

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ANNUAL WELLNESS VISITS (AWV)

Within this section, we will focus more on tips on how to complete comprehensive visits remotely and touch upon some billing/coding elements.

How To Perform An AWV Remotely



(1) Ensure all documentation related to consent, billing, and modality are documented.



(2) Perform a Health Risk Assessment (HRA) For a sample HRA, go to the resources section of this document where there is a link to a recommended HRA from the American Academy of Physicians.

- The provider (or provider's staff) should complete the HRA with the patient during the exam, through the patient portal before the exam, or over the phone beforehand.
- Ensure that this screening includes how the patient is feeling about their health in general.



(3) Compile the patient's personal medical history and their family history

• Can be done during the HRA



- (4) Reconcile all medications, immunizations
- Can be done during the HRA



(5) Establish a list of their current providers and healthcare suppliers

• Can be done during the HRA



(6) Measure their vitals to the best of your ability

 Routine measurements like height, weight, body mass index (BMI), blood pressure, pulse, and temperature, and pain assessment are documented as "patient-reported" or "unable to obtain due to" if they could not be measured. This information can also be collected at subsequent visits to allow for some narrative about changes in these measures.

ANNUAL WELLNESS VISITS (AWV) CONT.

How To Perform An AWV Remotely Cont.

(7) Screen for any concerning cognitive impairments, utilizing the Mini-Cog, Functional Activities Questionnaire, St. Louis University Mental Status Examination (SLUMS) or other screenings recommended by the USPSTF.



(8) Review potential risk factors for depression or other behavioral health concerns

- a PHQ-2 or PHQ-9 test can be administered for depression screening
- a GAD-7 test can also be administered for anxiety



(9) Review functionality, balance, fall risk, and level of safety in their environments

- This can be done by having the patient show you areas of their house and also set up a chair for a balance exercise.
- Balance/gait questions can be asked during this time to evaluate fall risk
- A questionnaire on Activities of Daily Living (ADLs) can be reviewed to assess risk
- Lastly, if any of these things cannot be documented the provider can use "unable to obtain due to ..."
- $\sqrt{}$ (10) Devise an appointment schedule for the next 5 to 10 years
 - This relates to all required screenings and immunizations
 - (11) Offer health advice and referrals for health education or preventive counseling services or programs based on the patient's needs



(12) Establish the risk factors and conditions for which primary, secondary, or tertiary interventions may be necessary or are already in motion

(13) Discuss advance care planning services

• This can be done in conjunction with the HRA and additional education related to advanced care planning can be documented (and billed for, there are 2 time-based codes)



ANNUAL WELLNESS VISITS (AWV) CONT.

<u>HIPAA-Compliant Platforms To</u> <u>Conduct AWVs</u>



<u>Codes</u>

G0438	GO439	G0468
Annual wellness	Annual Wellness	Federally qualified health
visit, including a	visit, including a	center (FQHC) visit, IPPE or
personalized	personalized	AWV; a FQHC visit that
prevention plan of	prevention plan of	includes an initial preventive
service (PPPS), first	service (PPPS),	physical examination (IPPE)
visit.	subsequent visit.	or annual wellness visit
		(AWV) and includes a typical
		bundle of Medicare-covered
		services that would be
		furnished per diem to a
		patient receiving an IPPE or
		AWV

EPSDT/WELL CHILD VISITS

Now that the PHE has ended, MedQuest will no longer cover these visits through telehealth, as the policy that was instated expired. Some components like screenings can be done remotely, if necessary. Additionally, these codes represent 'physical exams,' therefore most payers have aligned with MedQuest in reinstating the need for face to face visits for EPSDT and Well Child visits. The FAQ in this section has been removed for document clarity purposes.





PAYOR Matrix

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X PAYOR MATRIX

Payor	eVisit	Telehealth	Virtual Check-In	Telephone	Remote Patient Monitoring	Specialist Consults (eConsults)
Aetna	Covered	Covered Do not cover asynchronous telehealth services	Covered	Covered; for Acute E/M; BH only	Certain ones are covered if deemed medically necessary, like BP monitoring, glucose monitoring. For MA plans, follows Medicare guidelines	Varies by plan
AlohaCare	Covered	Covered	Covered	BH only covered	Covered	Covered
Cigna	Covered	Covered *No longer covered by urgent care centers starting 3/13/22	Covered Both G2010 and G2012	Covered	Covered 99091, 99457-99458, 99473-99474, 99493- 99494	Covered

X PAYOR MATRIX

Payor	eVisit	Telehealth	Virtual Check- In	Telephone	Remote Patient Monitoring	Specialist Consults (eConsults)
HMSA	Covered Not covered for commercial plans	Covered	Covered Not covered for commercial plans	Covered for MA and Quest (BH only) ; Commercial varies, refer to HHIN	Covered Covers 99091, 99457-99458, 99473-4, 99493- 4**	for codes 99446-
Humana	Covered	Covered Humana requires providers to utilize modifier 93 if using audio-only	Covered	Covered	Covered	MA is covered

X PAYOR MATRIX

Payor	eVisit	Telehealth	Virtual Check-In	Telephone	Remote Patient Monitoring	Specialist Consults (eConsults)
Medicaid Post PHE, MedQuest will be reverting to regular coverage policies.	Covered* Per policy QI- 2139, these codes are not covered.	Covered Per Policy QI- 2306, audio-only visits will be covered for mental health only	Covered* Per policy QI- 2139, these	Covered through PHE Per QI-2306, audio-only visits will be covered for mental health only		Covered
Medicare	Covered	Covered Audio-only covered through 2024	Covered	Covered Through 2024	Yes; 20% cost share	Covered
Ohana (Wellcare)	Covered	Covered	Covered	Not Connected	Based on medical necessity	Covered
United Healthcare	Covered	Covered	Covered	Covered	Covered	Covered

**Effective Jan. 1, 2021, commercial plans no longer separately reimburse for remote patient monitoring codes 99091, 99473- 99474,99493-99494.

PAYOR SPECIFIC Key points

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Visit Type	Codes + Modifier	Effective Date	Patient Type & Other Information
eVisit	99421-99423, 98970-98972, G2061-G2063		Noted that for commercial plans, there may be limitations once the PHE ends
Telehealth	Office visit codes + Commercial: POS 02* with Modifier GT or 95 Medicare Advantage: <u>POS 10</u> for telehealth provided in patient's home or other POS that correctly identifies where the patient is during telehealth appointment.	Aetna updated their <u>list of</u> <u>covered CPT</u> codes effective now.	Aenta does not pay for asynchronous visits for all plans
Virtual Check-In	G2010, G2012 G2250, G02251, G2252	March 6th, 2020	Established only
Telephone	99441-3		For acute E/M or BH only
Remote Patient Monitoring	99453-4; 99457-8	2022	Established only
eConsults	99446-99449; 99451, 99452		Noted that for commercial plans, there may be limitations once the PHE ends

*Urgent Care Centers should continue to use POS 20. All other facilities should continue to use their respective POS; CPTs and the telemedicine modifiers must be noted on the UB-04 and HCFA 1500 forms as the Rev Code will not be sufficient.

Important Note: Aetna has mentioned that their policies are currently expanded due to the PHE and that once it ends, there may be more limits on telehealth coverage.

<u>**Platforms:**</u> Aenta allows providers to utilize their own platforms for telehealth but also partners with Teladoc as their service provider. Providers must use secure platforms now that the PHE has ended. For options, refer to the HIPAA-compliant software section.



Visit Type	Codes + Modifier	Effective Date	Patient Type & Other Information
eVisit	99421-99423; G2061-G2063; 98970-98972		New or established
Telehealth	99201-99215; G0425-G0427; G0406-G0408		New or established
Virtual Check-In	G2012, G2252, G2251, G2010, G2250		New or established
Telephone	Covered for BH only		
Remote Patient Monitoring	99091, 99457-99458, 99473- 99474, 99493-99494		Established
eConsults	99446-99449; 99451, 99452		New or established

Important Note: AlohaCare will update their coverage for telehealth later on this year after annual review of coverage policies.

<u>**Platforms:**</u> Alohacare allows providers to utilize their own platforms for telehealth. They also provide Alohacare Telehealth Connect for their members.



Visit Type	Codes + Modifier	Effective Date	Patient Type & Other Information
eVisit	99422-3		N/A
Telehealth	99446-99452		The patient's clinical condition is of low to moderate complexity, and while it may be an urgent encounter, it should not be an emergent clinical condition.
Virtual Check-In	G2010. G2012		New or established
Telephone	99441-99443		New or established
Remote Patient Monitoring	99091, 99457-99458, 99473- 99474, 99493-99494		
eConsults	99446-99452		New or established

Important Note: Cigna has come out with no changes as their <u>Virtual Care Policy</u> implemented in January 2021 was a new standard of care moving forward. One important note is regarding POS coding: Effective 7/1/22, POS code POS 02 should be billed for virtual care services, do not bill pos 10 until further notice.

<u>Platforms</u>: Cigna allows providers to utilize their own platforms for telehealth as long as it a HIPAAcompliant/secure solution.



Visit Type	Codes + Modifier	Effective Date	Patient Type & Other Information
eVisit	99421-99423; 98970-98972		New or established
Telehealth	99201-99215; G0425-G0427; G0406-G0408 For audio-only visits, modifier 93 must be utilized.		New or established
Virtual Check-In	G2012, G2252, G2251, G2010, G2250		New or established
Telephone	99441-99443; 98966-98968		New or established
Remote Patient Monitoring	99091, 99457-99458, 99473- 99474, 99493-99494		Established only
eConsults	99446-99449; 99451, 99452		New or established

<u>Platforms:</u> Humana allows providers to utilize their own platforms for telehealth as long as it a HIPAAcompliant/secure solution.

🔀 HMSA

Visit Type	Codes + Modifier	Effective Date	Patient Type & Other Information
		1/1/21; commercial	For new or established patients;
eVisit	99421-99423; 98970- 98972** G0071-for FQHCs & RHCs	plans no longer separately reimburse for eVisits	**G2061-G2063 have been canceled as of 12/31/20. Replacement codes are 98970-98972 for MA and Quest members
Telehealth	99201-99215; G0425- G0427; G0406-G0408 Bill with appropriate place of service (02) or 10 modifier (95, GT, GQ or G0).		For new or established patients; after PHE ends, prior relationships must be substantiated
Virtual Check-In	G2012, G2252, G2251, G2010, G2250		For new or established patients. G2251, G2250 are for Medicare use only These codes are not a benefit of commercial plans.
Telephone	99441-99443; 98966-98968	Effective service dates: 8/1/21- 5/31/22	Coverage varies, refer to HHIN for commercial plans; for Medicare is covered through 2024; for Quest Integration-BH only
Remote Patient Monitoring	99091, 99457-99458, 99473-99474, 99493- 99494, 99453-99454		Established only
eConsults	99446-99449; 99451, 99452		For new or established patients. Effective 1/1/21, commercial plans no longer separately reimbursing for the following RPM codes: 99091, 99473-99474, 99493- 99494

Important Note: Beyond the coverage listed above, HMSA has the following within their policy: Medicare providers should continue to follow CMS guidelines. Quest integration providers should could continue to follow MedQuest guidelines.

<u>Platforms:</u> HMSA allows providers to utilize their own platforms for telehealth. HMSA also offers HMSA Online Care where patients can access their providers on the platform as well as other providers.



Visit Type	Codes + Modifier	Effective Date	Patient Type & Other Information
eVisit	99421-99423, G2061-G2063		
Telehealth	99202-99215		Site and provider flexibilities covered through 2024.
Virtual Check-In	G2010, G2012, G2250-G2251, G2252		
Telephone	99441-99443, 98966-98968		These visits are covered through 2024
Remote Patient Monitoring	99453, 99454, 99457, 99458, 99473, 99474, 99091		There are additional codes covered depending on medical necessity. Patients must be established effective 5/11/2023.
eConsults	99446-99449, 99451, 99452		

Platforms: Medicare allows providers to utilize their own platforms for telehealth that are HIPAA-compliant solutions. Per the latest guidance, these solutions must be in place at the end of the PHE. CCA has allowed for a 90-day transitional period to implement these secure technologies.



Visit Type	Codes + Modifier	Effective Date	Patient Type & Other Information
eVisit	99421-99423; 98970-98972		
Telehealth	99201-99215; 99241-99245		New or established; provider must be in network to establish care
Virtual Check-In	G2010, G2012, G2250, G2251, G2252		
Telephone	99441-99443		Behavioral Health only for MedQuest members
Remote Patient Monitoring	99453, 99454, 99457, 99458, 99473, 99474, 99091		There are additional codes covered depending on medical necessity. Patients must be established effective 5/11/2023.
eConsults	99446-99449, 99451, 99452		

<u>Platforms:</u> Ohana allows providers to utilize their own platforms for telehealth. Also available to members is MDLive.



Visit Type	Codes + Modifier	Effective Date	Patient Type & Other Information
eVisit	99421-99423; 98970-98972	Permanently allowable per UHC Telehealth/Telemed icine Policy effective 01/01/2021	communications can occur
Telehealth	Codes vary, refer to CMS fee schedule		See note within the telephone box below.
Virtual Check-In	G2010, G2012, G2250, G2251, G2252	Permanently allowable per UHC Telehealth/Telemed icine Policy effective 01/01/2021	
Telephone	99441-99443		Audio-Only Telehealth UnitedHealthcare aligns with the AMA and will consider for reimbursement the services, which are appropriate for reporting real-time, interactive audio-only telehealth, when appended with modifier 93, and reported with POS 02 or 10. CPT codes reported with modifier 93 that are not included United's CPT code set will not be eligible for reimbursement.

WITED HEALTHCARE CONT.

Visit Type	Codes + Modifier	Effective Date	Patient Type & Other Information
Monitoring	99453, 99454, 99457, 99458, 99473, 99474, 99091 RPM services are never rendered in-person and therefore should not be reported with POS 02 or 10 and/or a Telehealth modifier (95, GT, GQ or G0).	Telehealth/Telemed icine Policy effective	-
eConsults	99451 99452	Permanently allowable per UHC Telehealth/Telemed icine Policy effective 01/01/2021	Í

Platforms: United Healthcare allows providers to utilize their own platforms for telehealth. Modifiers 95, GT, GQ and GO are not required to identify Telehealth services but are accepted as informational if reported on claims with eligible Telehealth services.

COST SHARING WAIVER

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COST SHARING WAIVER (COPAY/COINSURANCE/ DEDUCTIBLE)

Now that the PHE is ending, cost sharing waivers are coming to a close. Please refer to each plan benefit design for any cost sharing guidance. We have removed this section for document clarity.

TELEHEALTH GUIDELINES BY FACILITY TYPE

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RURAL HEALTH CLINICS (RHCS)

As part of the CARES Act, Congress has authorized RHCs to be a "distant site" for telehealth visits, therefore allowing RHC practitioners to provide telehealth services. According to the CCA, this will continued to be allowed through the end of 2024.

Allowable Telehealth Codes:

Through the end of 2024, providers can provide any telehealth service that is approved as a Medicare telehealth service under the Medicare Professional Fee Schedule (PFS).

<u>Billing</u>

RHC Claims for Telehealth Services from 1/27/2020 through 12/31/2024			
Revenue Code	HCPCS Code	Modifiers	
052X	G2025	CG (required) 95	
RHC Claims for Telehealth Services starting 12/31/2024			
Revenue Code	HCPCS	Modifiers	
052X	G2025	95	

- Claims will automatically reprocess in July when the Medicare claims processing system is updated with the new payment rate.
 - RHCs do not need to resubmit these claims for the payment adjustment.
- Reimbursement: The RHC telehealth payment rate is set at \$92.03 per visit, which is the average amount for all PFS telehealth services on the telehealth list, weighted by volume for those services reported under the PFS. This rate will apply to telehealth visits performed by independent or provider based RHCs.



RURAL HEALTH CLINICS (RHCS) CONT.

- Telephone Services: Effective March 1st, 2020 RHCs can perform audio only telephone E/M services utilizing CPT codes 99441, 99442, and 99443. Note, these codes are covered with Medicare through 2024 and for MedQuest, only BH is covered.
- Virtual Check-Ins & E-Visits: Medicare will allow RHCs to perform E-Visits (CPT codes 99421-99423), which are online digital E/M services that utilize a secure patient portal. Medicare will also allow RHCs to perform Virtual Check Ins (HCPCS G2012 and G2010).
 - RHCs should bill HCPCS G0071 if E-Visit or Virtual Check-In services are performed
 - $\circ~$ G00071 is bundled into CPT Codes 99421, 99422, and 99423

FEDERALLY QUALIFIED HEALTH CENTERS (FQHCS)

As part of the CARES Act, Congress has authorized FQHCs to act as a "distant site" for telehealth visits, therefore allowing FQHC practitioners to provide telehealth services. According to the CCA, this will continued to be allowed through the end of 2024.

Allowable Telehealth Codes:

Through the end of 2024, FQHCs can furnish any telehealth service that is approved as a Medicare telehealth service under the PFS.

<u>Billing</u>

RHC Claims for Telehealth Services from 1/27/2020 through 12/31/2024			
Revenue Code	HCPCS Code	Modifiers	
052X	FQHC Specific Payment Code- G0466, G0467, G0468, G0469, G0470	None	
	FQHC PPS Qualifying Payment Code G2025	95	
RHC Claims for Telehealth Services starting 12/31/2024			
Revenue Code	HCPCS	Modifiers	
052X	G2025	95	



FEDERALLY QUALIFIED HEALTH CENTERS (FQHCS) CONT.

- Claims will be automatically reprocessed beginning July 1st, 2020 at the \$92.03 rate.
 - FQHCs do not need to resubmit these claims for payment adjustment.
- Reimbursement: The FQHC telehealth payment rate is set at \$92.03 per visit, which is the average amount for all PFS telehealth services on the telehealth list, weighted by volume for those services reported under the PFS.
- Telephone Services: Effective March 1st, 2020 RHCs can perform audio only telephone E/M services utilizing CPT codes 99441, 99442, and 99443. Note, these codes are covered with Medicare through 2024 and for MedQuest, only BH is covered.
- RHCs and FQHCs can bill for online digital evaluation and management services using the HCPCS code G0071 effective March 1, 2020. Code G0071 is bundled into CPT codes 99421, 99422, and 99423

<u>PPS Payment Scenarios (PPS will be</u> paid as follows as set forth by MQD)

Originating site (Patient Location)	Distant Site (Provider of FQHC Service Location)	Payment Model
FQHCPatient Residence	• FQHC	PPS
Not Above	• FQHC	FFS

PHYSICAL THERAPY (PT), OCCUPATIONAL THERAPY (OT) SPEECH THERAPY (ST)

Virtual visits for physical therapy, occupational therapy, and speech therapy have been a point of confusion for many hospitals and independent therapists. The two main points of misunderstanding are:

- 1. If PT/OT/ST therapists are considered by the payor a provider qualified to perform telehealth services.
- 2. If hospital-based PT/OT/ST therapists that bill for services on a UB-04 under the hospital NPI can perform virtual visits.
 - a.See the below matrix to determine what is covered by payer
 - b. Telephone codes are not represented within the below matrix, as most payers have determined that PT/OT/ST services must be furnished via an audiovisual connection.

<u> Coverage by Payer: Telehealth & eVisit</u>

Payer	Telehealth Coverage	eVisit
Aetna	Certain OT is covered; policy is posted in the Availity portal and updated annually	Individual therapists can bill CPT 98970-98972 or G2061- G0263 for evisits 97161-97167
AlohaCare	PT/OT/ST covered through virtual visits covered temporarily	Reach out to your provider representative for expansion guidance
Cigna	PT/OT/ST covered through virtual visits	Individual therapists can bill CPT 97161-97168, 97110, 97116, 97530, 97112, 97535, 92507, 92521-92524, 92526, 96105, 97129-97130



PHYSICAL THERAPY (PT), OCCUPATIONAL THERAPY (OT) SPEECH THERAPY (ST)

<u>Coverage by Payer: Telehealth &</u> <u>eVisit Cont.</u>

Payer	Telehealth Coverage	eVisit
	PT/OT/ST covered through virtual visits	Individual therapists can bill CPT 97161-97168, 97110, 97116, 97530, 97112, 97535, 92507, 92521-92524, 92526, 96105, 97129-97130
HMSA		HMSA: Independent PT, OT, ST providers must append modifier GO, GP, or GN when billing for G2010, G2012, G2061, G2062, G2063, G2251, G2252 and 98966– 98968. Codes are considered "sometimes therapy" codes.
Humana	PT/OT/ST covered through virtual visits covered temporarily	97161-97168, 97110, 97530, 92507, 92521-92524
Medicaid	97161-97164 are allowed to be billed through telehealth through December, 31, 2023. According to the CAA, PT/OT/ST can continue to utilize telehealth through December 31, 2024. In the previous guidance direct from Medicare, it would allow billing up to 151 days after the PHE ended, CAA extended this flexibility.	Allowable codes located on the 2022 CMS Fee Schedule

PHYSICAL THERAPY (PT), OCCUPATIONAL THERAPY (OT) SPEECH THERAPY (ST)

<u>Coverage by Payer: Telehealth &</u> <u>eVisit Cont.</u>

Payer	Telehealth Coverage	eVisit
Ohana (Wellcare)	PT/OT/ST covered through virtual visits covered temporarily	Refer to the <u>Ohana Provider</u> <u>Guide</u>
United Healthcare	PT/OT/ST covered through virtual visits	Individual therapists can bill CPT 97161-97168, 97110, 97116, 97112, , 92507, 92521-92524, 92526, 97750, 97755, 97760- 97761 The appropriate place of service code 02 or 10 in Box 24B. All PT/OT/ST Telehealth visits must be performed using live, interactive video conferencing that involves the presence of both parties at the same time and a communication link between them that allows a real-time audio and visual interaction to take place. E-mailing "stored" exercise videos and discussing or reviewing by phone is not reimbursable.





BILLING Scenarios



BILLING SCENARIOS

Patient		Billing	
Scenario	Visit	Medicare	Commercial & Medicaid
Est. patient arrives for a telehealth visit (audio + video) using HIPAA- compliant software	 Use of software (and documentatio n of software utilized) Care is 	Step 1: Use appropriate office code (99211-99215) Step 2: Use POS that would have been utilized if the service had been furnished in person Step 3: Use 95 modifier	Step 1: Use appropriate office code (99211-99215) Step 2: Use of Telehealth POS 02 or POS 10 Step 3: No modifier required
New patient arrives for telehealth visit (audio + video) using HIPAA- compliant software	 Use of software (and documentatio 	Step 1: Use appropriate office code (99202-99205) Step 2: Use POS that would have been utilized if the service had been furnished in person Step 3: Use 95 modifier	Step 1: Use appropriate office code (99202-99205) Step 2: Use of Telehealth POS 02 or 10 Step 3: No modifier required
Est. patient sends message (e- visit) through the online patient portal or some other secure platform	 Patient initiatives an e-visit on an issue/concern through the provider's online patient portal to the Physician, NP, or PA 	Step 1: Use approp (99421-99423) Step 2: Use approp Step 3: No modifie Medicare Advanta	oriate POS or required for

BILLING SCENARIOS CONT.

Patient		Bil	ling
Scenario	Visit	Medicare	Commercial & Medicaid
Est. patient sends message (e-visit) through the online patient portal or some other secure platform	through the provider's online patient portal to PT/OT/ST therapist	code (98970-0 Step 2: Use ap Step 3: No mo for Medicare <i>A</i> Medicaid	propriate POS difier required Advantage,
Est. patient connects for a brief check-in by audio only.	 Patient initiates a phone call with Physician, NP or PA Issue is not related to a medical visit within the last 7 days and not resulting in a medical visit within the next 24 hours 	Step 2: Use ap	G2012, G2252) propriate POS difier required
Est. patient connects for a brief check-in by audio only.	 Patient initiates a phone call with PT/OT/ST therapist Issue is not related to a medical visit within the last 7 days and not resulting in a medical visit within the next 24 hours 	Step 3: No mo	G2251) propriate POS difier required





Patient		Billing	
Scenario	Visit	Medicare	Commercial & Medicaid
Est. patient sends picture for evaluation using a brief check-in	 Patient sends a picture for evaluation to Physician, NP, or PA Issue is not related to a medical visit within the last 7 days and not resulting in a medical visit within the next 24 hours 	Step 1: Use appl HCPCS code (G Step 2: Use app Step 3: No mod for Medicare Ac Medicaid	2010) ropriate POS fier required
Est. patient sends picture for evaluation using a brief check-in and provider follows up	 Patient sends a picture for evaluation to PT/OT/ST therapist Issue is not related to a medical visit within the last 7 days and not resulting in a medical visit within the next 24 hours 	Step 1: Use appi HCPCS code (G Step 2: Use app Step 3: No mod for Medicare Ac Medicaid	2250) ropriate POS fier required
Est. patient requests eConsult to evaluate the need for specialist intervention	 Patient requests eConsult, consents to service 	Step 1: Use appl code (99451-99 Step 2: Use app Step 3: No mod for Medicare Ac Medicaid	453) ropriate POS fier required

HIPAA Compliant Software

HIPAA COMPLIANT Software

Starting 5/11/23, Medicare will no longer allow the use of nonsecure platforms for telehealth, the CCA has allowed for a 90-day transitional period to implement these technologies. Most other payers eliminated the coverage of these platforms over the last few years. For additional information by payer, refer to the HIPAA compliant statement within each payor section, or if the payor is not listed within this guide, reach out to the payor to verify their telehealth platform requirements.

Important Tip: Public facing platforms are NOT allowed, such as Facebook Live, TikTok, Snapchat, etc.

HHS Resource for HIPAA Compliant Software

Below we have compiled some tips for HIPAA-compliant software usage/selection.

<u>Choose a platform that fits the services</u> <u>you will deliver.</u>

Then, ensure the platform meets minimum requirements. Outside of the current PHE, the telehealth platform must be a HIPAAcompliant telehealth technology that meets HIPAA security and privacy standards, supported by a Business Associates Agreement(s) (BAA), and encrypted end-to-end.



HIPAA COMPLIANT SOFTWARE Cont.

<u>What technology do I need to use a</u> <u>telehealth platform?</u>

Equipment can vary depending on what telehealth vendor you select. Most telehealth technologies require the following items.

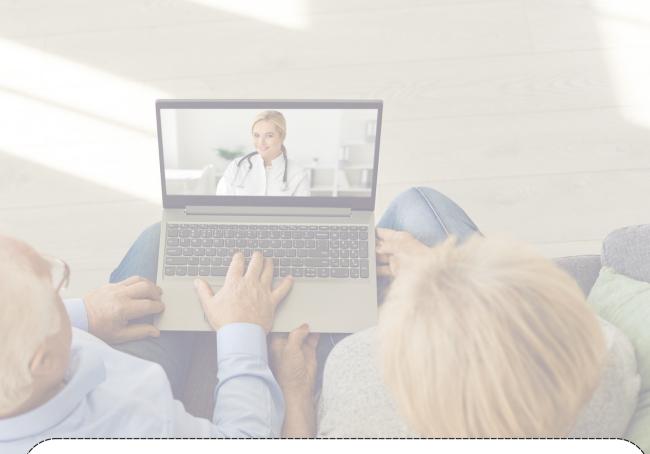
- A computer or mobile device. Ask your telehealth vendor which specific device(s) their software will run on.
- An integrated or external microphone.
- An integrated or external camera.
- Access to broadband internet. You'll need enough bandwidth (both patient and provider) to transmit audio and video data. Be sure to check your bandwidth before beginning a visit.
- Video connection/platform video interface.
- **Headphones.** To maintain privacy on the telehealth visit, we recommend wearing headphones.

<u>What does the patient need to use the platform?</u>

- Instructions on how to use the platform. Instructions will vary based on the platform.
- A laptop or desktop computer, smart phone, or smart device with a camera.
- Headphones. Are recommended.
- Access to broadband internet.
- A private area.

More information on selecting platforms:

- 1. Guidance on BAAs, including sample BAA provisions, is available at this <u>resource</u>.
- 2. Additional information about HIPAA Security Rule safeguards is available at <u>here</u>.
- 3. Resources on telehealth vendors and guidance is available at this <u>website</u>.



COVERAGE IN HAWAI'I BEYOND COVID-19

COVERAGE IN HAWAI'I BEYOND COVID-19

Please keep in mind that events and policies are changing now that the PHE has ended and Medicare has issued new guidance; this document will be updated at minimum annually as new information and policies become available/are enacted. The table below synopsizes where policies currently stand for Medicare fee-forservice, Med-QUEST, and commercial carriers in Hawaii.

Key Policy Considerations	Medicare	MedQuest (Medicaid)	Private Payers
No Geographic limitations for telehealth service not limited to rural or non- metropolitan service area locations)	Yes According to the Section 4113a of the CCA, the distant site locations are allowed through 12/31/2024	Yes	Yes
Out of state providers allowed		HB666 is proposed allowing expansion of out	of state providers to see
Patient home is eligible originating site	Yes According to the Section 4113a of the CCA, the distant site locations are allowed through 12/31/2024	Yes	Yes



Key Policy Considerations	Medicare	MedQuest (Medicaid)	Private Payers
Other non- healthcare facilities are eligible originating sites (e.g. schools, libraries)	Yes According to the Section 4113a of the CCA, the distant site locations are allowed through 12/31/2024	Yes	Yes
Originating sites other than patient homes can bill a facility fee	Rural: Yes Urban, Metro: No	No	No Varies by payer
Prior existing relationship with patient is required	No Certain codes require it, like RPM codes post- PHE	No	No
Any provider type eligible to use telehealth, as long as practicing within scope	No According to the CCA, the additional provider types like PT/OT/ST are allowed through 12/31/2024	Yes	No Varies by payer
DEA-registered practitioners may issue prescriptions for controlled substances without requiring in-person medical evaluation	opioids are	Yes Certain circumstances for opiates, not covered for medical cannabis, HRS 453-1.3(c)	Yes Certain circumstances for opiates, not covered for medical cannabis, HRS 453-1.3(c)

Key Policy Considerations	Medicare	MedQuest (Medicaid)	Private Payers
Any eligible member service can be provided via telehealth when medically necessary and appropriate Prior authorizations not required for telehealth services, unless in- person service also requires prior authorization	No Yes	Yes	Yes Varies by payer Yes
Providers can use all telehealth modalities to deliver services (live video, store- and-forward, remote patient monitoring)	Yes	Yes	Yes (ensure medical necessity for RPM)
Providers paid for telephone/audio only visits (virtual check-ins; eConsults)	Yes Only covered through 2024	No Telephone is BH only no other audio-only covered	Yes Varies by payer



Key Policy Considerations	Medicare	MedQuest (Medicaid)	Private Payers
Providers can	Yes	Yes	Yes
deliver services via			Virtual Check-
technology-based	Virtual	Virtual	ins, e-Visits
communications	Check-ins	Check-ins	Varies by
that are not	G2010, G2012	G2010, G2012,	Payer; some
typically	G0071 (FQHCs)	G2251, G2252	only cover
considered			Medicaid and
telehealthi.e.	eConsults	eConsults	Medicare
virtual check-ins,	99446-99449,	99451-99452	patients
interprofessional	99551-99452		and not
internet		e-Visits	commercial
consultations	e-Visits	99421-99423	
(eConsults),	99421-99423,	98970-98972	
remote monitoring	G2061-G2063		
services (CCM,		Remote Patient	
Complex CCM,		Monitoring	
TCM, Remote PM,		99453, 99454,	
PCM), online		99457, 99458	
digital evals (see			
CCHP Telehealth			
Policies for specific			
codes and criteria)			
Patient consent is	Yes	Yes	Yes
required, however			Varies by paye
verbal consent is			
acceptable (i.e.			
written consent not			
required)			

A new policy came out shortly after the PHE-ended from MedQuest. Below is an overview of that policy:

 HB907/QI-2306: Real-Time Audio-Only Interaction Policy After The Federal Public Health Emergency Related To The COVID-19 Pandemic Expires

MQD will continue to reimburse select healthcare services delivered through audio-only communication technology after the Federal PHE expires. The following guidance is in effect until December 31, 2025. Reimbursement for services provided through telehealth via an interactive telecommunications system shall be equivalent to reimbursement for the same services provided via inperson contact between a health care provider and a patient; provided that reimbursement for the diagnosis, evaluation, or treatment of a mental health disorder delivered through an interactive telecommunications system using two-way, real-time audio-only communication technology shall meet the requirements of title 42 Code of Federal Regulations section 410.78.

Covered codes: 90847, 90853 Non-covered codes: 90875, 90901



LIST OF Acronyms



Acronym	Definition	
ACP	Advanced Care Planning	
AWV	Annual Wellness Visit	
BAA	Business Associates Agreement	
BH	Behavioral Health	
CCA	Consolidated Appropriations Act	
ССМ	Chronic Care Management	
CMS	Center for Medicare & Medicaid Services	
CNSs	Clinical Nurse Specialists	
СР	Clinical Psychologist	
CPT	Current Procedural Terminology	
CSW	Clinical Social Workers	
CTBS	Communication Technology Based Services	
DEA	Drug Enforcement Administration	
E/M	Evaluation & Monitoring Codes	
EPSDT	Early, Periodic, Screening and Diagnostic Testing	
F2F	Face to Face	
FAQ	Frequently Asked Questions	
FFS	Fee For Service	
FQHC	Federally Qualified Health Center	
FQHC PPS	Prospective Payment System	
GAD7	General Anxiety Disorder (screening)	
HCFA	Claim Type	
HCPCS	Healthcare Common Procedure Coding System	
HHS	Health & Human Services	
HIPAA	Health Insurance Portability & Accountability Act	
HMSA	Hawai'i Medical Services Association	
HRA	Health Risk Assessment	
IPPE	Initial Preventative Physical Examination	
MQD	MedQuest Division	



Acronym	Definition
NP	Nurse Practitioner
ОТ	Occupational Therapy
PA	Physician's Assistant
PBTRC	Pacific Basin Telehealth Resource Center
PE	Physical Expense
PFS	Physician Fee Schedule
PHE	Public Health Emergency
PHQ2/PHQ9	Patient Health Questionnaire (screening for depression)
POS	Point of Service
PPPS	Personalized Prevention Plan of Service
QI	Quest Integration
RD	Registered Dietitian
Rev Code	Revenue Code
RHC	Rural Health Clinic
RPM	Remote Patient Monitoring
ST	Speech Therapy
ТСМ	Transitional Care Management
UB-04	Claim type also known as CMS 1450

REFERENCES & RESOURCES



Resource Description	Reference Link
AAMC Regulatory Resource on 2021 Medicare Coverage of Remote Physiologic Monitoring	
Licensure Requirements	 <u>https://www.cchpca.org/resources/state-</u> <u>telehealth-laws-and-reimbursement-policies-</u> <u>report-fall-2021/</u>
Specialist Consult Workflow	 <u>https://www.caltrc.org/wp-</u> content/uploads/2018/07/MCEIStandardWorkflo <u>wv1.pdf</u>
eConsults	 <u>https://www.apg.org/wp-</u> <u>content/uploads/2019/07/eConsults-Improve-</u> <u>Patient-Access-Lower-Costs-07.11.19.pdf</u>
AWVs	 <u>https://medicare.pacificsource.com/Base/DocumentContent/DCmSyINJP-fHIAYnItQXa75QJYTHjSTsJ1H8-v7u13OPkGj Ex0xMp-LDLVtG-NB/Medicare%20AWV%20Telehealth%20Component%20Guide</u> <u>https://edhub.ama-assn.org/steps-forward/module/2757861</u>
Health Risk Assessment Samples	 <u>https://www.in.gov/health/files/HRA.pdf</u> <u>https://www.aafp.org/fpm/2012/0300/fpm2012</u> <u>0300p11.pdf</u> <u>https://www.uthscsa.edu/sites/default/files/HR</u> <u>A%20Template.pdf</u>



Resource Description	Reference Link
EPSDT	 <u>https://www.medicaid.gov/medicaid/benefits/d</u> <u>ownloads/medicaid-chip-telehealth-toolkit-</u> <u>supplement1.pdf</u> <u>https://www.gatewayhealthplan.com/Portals/0/</u> <u>provider_forms/PediatricTelehealthGuide.pdf</u>
Physical Therapy Guidance	 <u>https://www.outsourcestrategies.com/blog/how</u> <u>-to-bill-physical-therapy-telehealth-services-in-</u> 2023/#:~:text=Physical%20therapists%20can%20 <u>bill%20for,</u> <u>(including%20the%20beneficiary%27s%20home).</u>
PHE Ending Guidance (CCA)	 <u>https://www.hklaw.com/en/insights/publication</u> s/2023/05/covid19-phe-ends-may-11-what-it- means-for-the-provision-of
Aetna	 <u>https://www.aetna.com/health-care-professionals/covid-faq/telemedicine.html</u> 2023 Guidance: <u>https://lakelandcare.com/sites/lakelandcare.com/sites/lakelandcare.com/files/attachments/Aetna%20Telemedicine%2</u> <u>Oand%20Direct%20Patient%20Contact%2006_21</u> <u>.pdf</u>
AlohaCare	 <u>https://health.hawaii.gov/bhhsurg/files/2020/04</u> /AlohaCare-Telehealth-Reference-Payment- Policy-200320.pdf



Resource Description	Reference Link
Cigna	 2023 Guidance: <u>https://www.cigna.com/assets/docs/pcomm/virtual-care-reimbursement-policy.PDF</u> <u>https://medicareproviders.cigna.com/static/medicareproviders-cigna-com/docs/coronavirus-billing-guidelines-faq.pdf</u> <u>https://drive.google.com/file/d/1rPvQ_PvqOWtxAQgkMAAq0UtSkMkPL7iP/view?usp=sharing</u>
HMSA	 https://cdn1-originals.webdamdb.com/14017_117572234? cache=1646782791&response-content- disposition=inline;filename=COVID- 19%2520Coding%2520Guide%2520for%2520Providers%25 202022_v4_2022-0307.pdf&response-content- type=application/pdf&Policy=eyJTdGF0ZW1lbnQiOlt7lIJlc2 91cmNlljoiaHR0cCo6Ly9jZG4xLW9yaWdpbmFscy53ZWJkY W1kYi5jb20vMTQwMTdfMTE3NTcyMjM0P2NhY2hIPTE2NDY 30DI30TEmcmVzcG9uc2UtY29udGVudC1kaXNwb3NpdGlv bj1pbmxpbmU7ZmlsZW5hbWU9Q09WSUQtMTklMjUyMENv ZGluZyUyNTIwR3VpZGUIMjUyMGZvciUyNTIwUHJvdmlkZXJzJ T11MjAyMD1yX3Y0XzIwMjltMDMwNy5wZGYmcmVzcG9uc2U tY29udGVudC10eXBIPWFwcGxpY2F0aW9uL3BkZilslkNvbm RpdGlvbil6eyJEYXRITGVzc1RoYW4iOnsiQVdT0kVwb2NoVGI tZSl6MjE0NzQxNDQwMH19fV19&Signature=GGj~kpa6gZGh BpRxnLM~Tds8Av~BojShRhm0PuDbvMzhAygzB0omlcGAns QZ6KOcl2PfW4N25~9GpR7R5fckyfJcqrBuYT92NM0PkImQj6 2Rm~xskFPiyyhSsLiZ6362K5hg5Y5rob-~XjrZMxCKw1- OSgFq9zD28lMW4PRabrethqgbn3ed6amf48F0kOlvxZKIYm vS6KTN~r2EVII1ZD4XahfeVV6s3jk9Xv00eRHa- CRzwp3lpC3KF- ITKf7J1rVLtm9w2722n4MAHZXP6c0gSzZILd0ekFl8Yh21jja33 ujtGcNEy-94SVJ~ugynhngyonwnKQKEM1UAD5CAQ_&Key- Pair-Id=APKAI2ASI2I0LRFF2RHA



Resource Description	Reference Link
Humana	 <u>https://drive.google.com/file/d/1k4W7JgQxK_XBZ</u> <u>E6AW_k8j6foYzyVqNnE/view?usp=sharing</u> <u>https://drive.google.com/file/d/1DkwPFyS1czSUo</u> <u>HWdS1aPIcsvxyVcFQUj/view?usp=sharing</u>
Ohana (Wellcare)	 2023 Guidance: Medicare Advantage <u>https://www.wellcare.com/-/media/PDFs/Hawaii</u> /Provider/2023/HI Care Medicare Advantage Pr ovider Manual 2023 R.ashx Medicaid <u>https://www.ohanahealthplan.com/content/dam</u> /centene/wellcare/hi/pdfs/HI Caid Prov 2022 M edicaid Provider Manual 2023 R.pdf
United Healthcare	 <u>https://www.uhcprovider.com/content/dam/pro</u> vider/docs/public/resources/news/2020/Telehe alth-Patient-Scenarios.pdf