



Part One of a Three-Part Series on Telehealth Billing:

# The Logistics and Best Practices for Billing and Coding for Telehealth

PRESENTERS:

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# Welcome and Introductions

# Polling Questions

Did you start using Telehealth during the pandemic? Y/N

Do you plan to continue the use of Telehealth after the Public Health Emergency? Y/N

# Telehealth and Wyoming Medicaid

**BILLING AND CODING THROUGH COVID**

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Commit to your health.

# Early Proponent

- ▶ Wyoming Medicaid has been an advocate for telehealth services for more than a decade.
  - ▶ First policy implemented in 2007
  - ▶ Majority of claims were for psychiatric and other behavioral health services
- ▶ Promoted across the state
  - ▶ Statewide Medicaid supported provider trainings
  - ▶ Collaboration with the WY Telehealth Consortium and the University of Wyoming
- ▶ Previous work allowed us to be poised to help and support our providers during the public health emergency.

# COVID-19 Public Health Emergency

## Flexibilities

- ▶ Group therapy allowed during PHE for 2-10 clients.
- ▶ Telephonic services also allowed during the PHE.
- ▶ Any service that could normally take place in office would be considered, with exception of teledentistry.

## Changes

- ▶ Telehealth consent forms are no longer required
  - ▶ Clients provide consent by email, text, or verbally, and this must be properly documented with the provider.
- ▶ The originating site fee is not billable if the client uses their own equipment, such as personal phones, tablets, or computers.

# Billing and Looking Forward

- ▶ Telehealth services should be billed as follows
  - ▶ Q3014 for originating site
  - ▶ GT modifier for distant site
  - ▶ Documentation should state that service was provided via telehealth and what method was used.
- ▶ Many CMS allowed flexibilities look to become permanent
  - ▶ Some will still require federal legislative action to remain
- ▶ Remote patient monitoring services starting to gain traction
  - ▶ Chronic illnesses and pregnant women being first groups

# Resources for coding and billing telemedicine services

## CONTACT INFORMATION:

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# Where to find Information on billing for telehealth during the PHE...



- ▶ CMS/Medicare – COVID FAQs
- ▶ <https://www.cms.gov/files/document/medicare-telehealth-frequently-asked-questions-faqs-31720.pdf>
- ▶ Updated 01/07/2021

Many payers are following CMS guidelines with regard to telehealth waivers; however, each payer is different. It is always recommended that you verify on each payer website or call the provider services department for clarification

- ▶ HHS
- ▶ <https://www.telehealth.hhs.gov/providers/billing-and-reimbursement/>



**Did you know?** During the COVID-19 public health emergency, any health care provider who is eligible to bill Medicare can bill for telehealth services regardless of where the patient or provider is located. For more information about what is covered, see:

- [Medicare Coverage and Payment of Virtual Services](#)  (video) – from the Centers for Medicare & Medicaid Services
- [List of Telehealth Services](#) – from the Centers for Medicare & Medicaid Services
- [Current State Laws & Reimbursement Policies](#)  – from the National Telehealth Policy Resource Center

# Payer website information

- ▶ CIGNA
  - ▶ <https://static.cigna.com/assets/chcp/resourceLibrary/medicalResourcesList/medicalDoingBusinessWithCigna/medicalDbwCVirtualCare.html>
- ▶ Tricare/Triwest
  - ▶ [https://www.tricare-west.com/content/hnfs/home/tw/prov/claims/billing\\_tips/telemedicine.html](https://www.tricare-west.com/content/hnfs/home/tw/prov/claims/billing_tips/telemedicine.html)
- ▶ Aetna
  - ▶ <https://www.aetna.com/health-care-professionals/covid-faq/billing-and-coding.html>

# Payer website information

- ▶ UnitedHealthcare
  - ▶ <https://www.uhcprovider.com/en/resource-library/news/2020-network-bulletin-featured-articles/1020-telehealth-policy-updates.html>
- ▶ BCBS of Wyoming
  - ▶ <https://www.bcbswy.com/covid19/>
- ▶ WC
  - ▶ [http://www.wyomingworkforce.org/\\_docs/providers/bulletins/2020-13-covid19.pdf](http://www.wyomingworkforce.org/_docs/providers/bulletins/2020-13-covid19.pdf)

# Know your waivers

- ▶ CMS Resource for Blanket Waivers

- ▶ <https://www.cms.gov/files/document/summary-covid-19-emergency-declaration-waivers.pdf>

- ▶ Other Payer Waivers

- ▶ Go to the payer website regularly to review their specific guidance on waivers for telehealth during the PHE
  - ▶ Some payers have listed extensions, changes to services allowed, practice across state lines, waivers, cost share, specific coding and/or modifier requirements, place of service, telephonic vs. video

# Site Reminder for Telemedicine

- ▶ The Originating site – where the patient is located (home, SNF, facility)
- ▶ The Distant site – where the provider is located (clinic, facility, home, etc.)  
under the PHE, you still bill POS 11 when the provider is working from their home

# Coding and Billing Resources for Telehealth During PHE



- ▶ Coding Scenario: Coding for Telehealth Visits
  - ▶ <https://www.aafp.org/family-physician/patient-care/current-hot-topics/recent-outbreaks/covid-19/covid-19-telehealth/coding-scenarios-during-covid-19/telehealth.html>
  - ▶ Excellent resource that shows POS and modifiers by payer broken down by COVID-19 related and non-COVID related visits



How do I code a new or established patient telehealth visit that uses audio-video or audio-only for COVID-19-related care?

	Aetna	Anthem*	Cigna	Humana	UHC	Medicare*
CPT Codes: 99201-99205, 99211-99215						
<b>Place of Service (POS)</b>	Commercial: 02 Medicare Advantage: Use POS that would have been used if the service had been provided in person (e.g., POS 11 – Office)		Use POS that would have been used if the service had been provided in person (e.g., POS 11 – Office)	Use POS that would have been used if the service had been provided in person (e.g., POS 11 – Office)	Use POS that would have been used if the service had been provided in person (e.g., POS 11 – Office)	Use POS that would have been used if the service had been provided in person (e.g., POS 11 – Office)
<b>Modifier</b>	Commercial: -GT or -95 Medicare Advantage: -95		-GQ, -GT, or -95 (all three accepted) - CS *Must use appropriate ICD-10 code (Z03.818 or Z20.828)	-95 -CS	-95	95 -CS
<b>Cost-share</b>	Yes	Yes	Yes	Yes	Yes	Yes



<https://www.aafp.org/family-physician/patient-care/current-hot-topics/recent-outbreaks/covid-19/covid-19-telehealth/coding-scenarios-during-covid-19/telehealth.html>

# Recommended consent documentation for a telemedicine visit example:

- ▶ Document in note that the visit is occurring by/through telemedicine
- ▶ Document verbal consent given by the patient for a telemedicine visit
- ▶ Document modality used for visit (InTouch, Zoom, etc.)
- ▶ Document location of the patient
- ▶ Document that patient has been informed that this visit will be billed to insurance (just like a face-to-face visit)



# Polling Questions

- ▶ Have your telehealth visits increased in the last six months? Y/N
- ▶ Has this presentation answered questions that will help resolve your billing issues? Y/N

# Look into my Crystal Ball

## CONTACT INFORMATION

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# What does the future hold?

- ▶ New legislation both federal and state
- ▶ Research and other data will be reviewed
- ▶ Additional funding to address barriers like Broadband Access
- ▶ Return to HIPAA and secure platform enforcement
- ▶ Payor parity
- ▶ Fraudulent claims concerns
- ▶ Review of costs and savings
- ▶ Patient satisfaction / Patient engagement

# Notice of Enforcement Discretion

- ▶ Under this Notice, covered health care providers may use popular applications that allow for video chats, including Apple FaceTime, Facebook Messenger video chat, Google Hangouts video, Zoom, or Skype, all available encryption and privacy modes when using such applications.
- ▶ However, Facebook Live, Twitch, TikTok, and similar video communication applications are public facing, and should not be used in the provision of telehealth by covered health care providers.
- ▶ <https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html>

# Remote Patient Monitoring

- ▶ Wyoming RPM Initiative
  - ▶ Application link - [please complete this provider request form.](#)
- ▶ Connect America Demonstration
  - ▶ Wednesday, February 3<sup>rd</sup> from 9-10 am
  - <https://global.gotomeeting.com/join/587814525>

# Resources

- ▶ Wy Telehealth Network - <http://www.uwyo.edu/wind/wytn/>
- ▶ Center for Connected Health Policy - <https://www.cchpca.org/>
- ▶ NW Regional Telehealth Resource Center - <https://nrtrc.org/>
- ▶ Telehealth Funding Opportunities - <https://nrtrc.org/covid/funding.shtml>
- ▶ Connect America - <https://www.connectamerica.com/>

# ▶ Questions?

**Join us next month when we hear from payers!**

Wednesday, February 24 from 12 pm – 1 pm: Revisiting Billing Reimbursement for Telehealth.

