



## SWH MA COVID-19 Telehealth Provider Q&A

Question	Answer
<p>What is telehealth?</p>	<p><b>The traditional CMS definition of telehealth is:</b></p> <p>“...the transmission of a patient's medical information from an originating site to the physician or practitioner at the distant site. The physician or practitioner at the distant site can review the medical case without the patient being present. An asynchronous telecommunications system in single media format does not include telephone calls, images transmitted via facsimile machines and text messages without visualization of the patient.</p> <p>For more information, visit 42 CFR 410.78 at: <a href="https://www.law.cornell.edu/cfr/text/42/410.78">https://www.law.cornell.edu/cfr/text/42/410.78</a>.</p> <p><b>The traditional Federal Medicaid definition of telemedicine is:</b></p> <p>“permitting two-way, real time interactive communication between the patient, and the physician or practitioner at the distant site. This electronic communication means the use of interactive telecommunications equipment that includes, at a minimum, audio and video equipment.</p> <p>Telemedicine is viewed as a cost-effective alternative to the more traditional face-to-face way of providing medical care (e.g., face-to-face consultations or examinations between provider and patient) that states can choose to cover under Medicaid. This definition is modeled on Medicare's definition of telehealth services (42 CFR 410.78). Note that the federal Medicaid statute does not recognize telemedicine as a distinct service.”</p> <p>For more information, visit: <a href="https://www.medicaid.gov/medicaid/benefits/telemedicine/index.html">https://www.medicaid.gov/medicaid/benefits/telemedicine/index.html</a>.</p>
<p>What has changed for telehealth?</p>	<p>MassHealth has issued guidance in the form of three bulletins: 289, 290 and 291.</p> <p>MassHealth will permit qualified providers to deliver clinically appropriate, medically necessary MassHealth-covered services to MassHealth members via telehealth (including telephone and live video) in accordance with the standards set forth in Appendix A and notwithstanding any regulation to the contrary, including the physical presence requirement at 130 CMR 433.403(A)(2).</p> <p>MassHealth is not imposing specific requirements for technologies used to deliver services via telehealth and will allow reimbursement for MassHealth</p>

	<p>covered services delivered through telehealth so long as such services are medically necessary and clinically appropriate and comport with the guidelines set forth in Appendix A. Providers are encouraged to use appropriate technologies to communicate with individuals and should, to the extent feasible, ensure the same rights to confidentiality and security as provided in face-to-face services. Providers must inform members of any relevant privacy considerations.</p> <p>Rates of payment for services delivered via telehealth will be the same as rates of payment for services delivered via traditional (e.g., in-person) methods set forth in the applicable regulations. Providers must include Place of Service Code 02 when submitting a claim for services delivered via telehealth.</p> <p>For more information please see the MassHealth link on the last page of this document.</p> <p>CMS has broadened access to Medicare telehealth services so that beneficiaries can receive a wider range of services from their doctors without having to travel to a health care facility.</p> <p>For more information please refer to the CMS provider fact sheet for telehealth link on the last page of this document.</p>
<p>Where can I find updated provider communications regarding COVID-19?</p>	<p>Please review the C19 memo to providers, Senior Whole Health placement process, 90-day hold on PA notice and the MassHealth fax blast documents provided by SWH posted on our provider website at <a href="https://www.seniorwholehealth.com/home/providers-massachusetts">https://www.seniorwholehealth.com/home/providers-massachusetts</a></p>
<p>When do the special telehealth exceptions and measures outlined in this document take effect and how long will they remain in effect?</p>	<p>As a plan we are following the MassHealth and CMS guidelines which will stay in place while the federal emergency is in effect or until state guidance changes. We will share any updates via fax blast and our website.</p>
<p>Due to COVID-19, many of my patients are sick/quarantined/at high risk or simply don't want to come in for a session...</p>	<p>We encourage you to use telehealth and strongly suggest that you use a HIPAA-compliant telehealth platform (real-time, interactive audio and video).</p>
<p>Can I conduct outpatient sessions with SWH MA members virtually/via computer using a HIPAA-compliant platform?</p>	<p>Yes, however, considering the COVID-19 crisis and member access issues, you may have to utilize other methods such as FaceTime or Skype in order to ensure the member gets the help they need (see question directly below for guidance on NON-HIPAA-compliant methods).</p>

<p>How should I bill this?</p>	<p><b>Medicare coverage:</b></p> <ul style="list-style-type: none"> <li>• CMS will pay clinicians to provide telehealth services for Medicare beneficiaries across the country.</li> <li>• Telehealth services for common office visits, mental health counseling, and preventive health screenings will be covered.</li> <li>• Telehealth services can be conducted from the beneficiaries’ home.</li> <li>• Telehealth methods include phone, video chat, and online patient portals.</li> <li>• Doctors, nurse practitioners, clinical psychologists and licensed clinical social workers will be able to offer telehealth to Medicare beneficiaries.</li> </ul> <p>Please see the CMS link located on the last page of this document for billing information.</p>
<p>Can I conduct outpatient sessions with Senior Whole Health members via <b>telephone or a non-HIPAA-compliant method (e.g., Skype or FaceTime)</b>?</p> <p>How should I bill this?</p>	<p>We strongly suggest that you use a HIPAA-compliant telehealth platform, which includes both audio and video. (See below for further instruction on telehealth platforms.) However, if this is impossible due to the COVID-19 crisis, you may use telephone or a non-public method such as Skype or FaceTime for sessions. Note: Public-facing sites such as Facebook Live, TikTok, Twitch, YouTube, etc., should <b>NEVER</b> be used for telehealth.</p> <p>MassHealth will reimburse physicians for clinically appropriate, medically necessary telephone evaluations through the following CPT codes for physicians:</p> <ul style="list-style-type: none"> <li>• 99441</li> <li>• 99442</li> <li>• 99443</li> </ul> <p>For qualified non-physicians:</p> <ul style="list-style-type: none"> <li>• 98966</li> <li>• 98967</li> <li>• 98968</li> </ul> <p>Please see the MassHealth link on the last page of this document for billing information.</p>
<p>Can I conduct outpatient sessions with SWH MA members via text?</p>	<p>No, sessions via text message are not permissible.</p>
<p>Will you support outpatient sessions via telephone under all plans/products?</p>	<p>Yes, during this crisis, we are we are following the CMS guidelines and are waiving our normal protocols to allow providers to provide and bill sessions by telephone.</p>
<p>Do I need an addendum in place to bill telephone sessions?</p>	<p>No, a contract addendum is not necessary to bill during this COVID-19 crisis.</p>

Are there specific telephonic codes I should use?	Please see the MassHealth and CMS links in order to bill the appropriate covered services.
I'm sick and/or quarantined and can't see patients at all. What should I do to ensure my patients get the care they need?	If you are unavailable to care for your patients but have an alternate plan in place for your practice you should notify SWH provider relations at 1-855-838-7999 to ensure members are directed accordingly.
Can I conduct medication management/prescribing via telehealth or telephone?	<p>If you are an MD contracted to provide these services, yes you may.</p> <p>If you provide the service using a HIPAA-compliant telehealth platform, bill using the GT or 95 modifier and place of service 02.</p> <p>If you use a NON-HIPAA-compliant platform due to the crisis situation or member access issues, bill using the GQ modifier and place of service 02. Note: Public-facing sites such as Facebook Live, TikTok, Twitch, YouTube, etc., should <b>NEVER</b> be used for telehealth.</p>
How do I become a telehealth provider?	During this crisis, you can begin to deliver telehealth services immediately. We encourage you to use a HIPAA-compliant telehealth platform. Bill with the GT or 95 modifier and place of service 02. Visit <a href="http://www.seniorwholehealth.com">www.seniorwholehealth.com</a> for more information.
Do you require that I use a specific telehealth platform?	No, a variety of HIPAA-compliant platforms are available, and you may use any of those (American Well, Clocktree Health, Theralink, etc.).
Can I use Skype or FaceTime for telehealth sessions?	<p>We highly suggest using a telehealth platform that is HIPAA-compliant, however during this crisis we want members to receive the help they need, so you may use these methods – only on a temporary basis – to ensure patient needs are met. Bill using the GQ modifier and place of service 02.</p> <p>Note: Public-facing sites such as Facebook Live, TikTok, Twitch, YouTube, etc., should <b>NEVER</b> be used for telehealth.</p>
Are there any changes to the telehealth codes or extension of codes?	For telehealth billing information please visit the MassHealth and CMS links located on the last page of this document.
During this crisis, do I still need to obtain preauthorization for services (inpatient or outpatient) that normally require it?	<p>From March 23 through June 23, 2020, Senior Whole Health is implementing a <u>90-day suspension of prior authorization for discharge to home health, rehabilitation (Rehab) and skilled nursing facilities (SNF) following an inpatient admission.</u></p> <p>Details can be found at <a href="http://www.seniorwholehealth.com">www.seniorwholehealth.com</a></p>

Do all existing documentation, licensing and requirements to provide services remain in effect?	We are following State and National Accreditation standards as it relates to extensions on recredentialing.
During this crisis, are you relaxing your site visit requirements or timelines for recredentialing?	We are following State and National Accreditation standards as it relates to extensions on recredentialing. If you have specific questions please contact provider relations at 1-855-838-7999 or <a href="mailto:providerrelations@seniorwholehealth.com">providerrelations@seniorwholehealth.com</a> .
During this crisis, will you broaden the provider types who can submit certain services?	No, providers must continue to practice within their scope of services.
Whom can I contact for more information or specific questions about my concerns or patients' needs?	Please call provider relations at 1-855-838-7999.
How do you intend to update providers on your approach to COVID-19?	We will post information on our website at <a href="http://www.seniorwholehealth.com">www.seniorwholehealth.com</a> We also may send periodic updates via email or fax. Please ensure your contact information is up to date by checking our online provider search tool. If your information needs to be updated please notify provider relations at <a href="mailto:providerrelations@seniorwholehealth.com">providerrelations@seniorwholehealth.com</a> .

#### Facility-specific Q&As

Question	Answer
Can I provide attending physician services to members in inpatient settings via telehealth or telephone?	<p>Yes, during this crisis we will allow provision and billing of attending physician services via telehealth, if you are delivering the same service via a telehealth platform – i.e., the same frequency and intensity of service, using the same attending codes. If you provide the service using a HIPAA-compliant telehealth platform, bill using the GT or 95 modifier and place of service 02.</p> <p>If you use a NON-HIPAA-compliant platform due to the crisis situation or member access issues, bill using the GQ modifier and place of service 02. Note: Public-facing sites such as Facebook Live, TikTok, Twitch, YouTube, etc., should <b>NEVER</b> be used for telehealth.</p> <p>[MCC of VA: DMAS is waiving the requirement that provider staff must be with the patient at the originating site in order to bill DMAS</p>

	<p>for the originating site facility fee. During the current emergency, DMAS will allow the home as the originating site.]</p> <p>During this crisis we will allow provision and billing of attending physician services via telehealth, <b>but not over the phone</b>. If you provide the service using a HIPAA-compliant telehealth platform, bill using the GT or 95 modifier and place of service 02.]</p> <p>If you use a NON-HIPAA-compliant platform due to the crisis situation or member access issues, bill using the GQ modifier and place of service 02.</p> <p>Note: Public-facing sites such as Facebook Live, TikTok, Twitch, YouTube, etc., should <b>NEVER</b> be used for telehealth.</p>
<p>Can I provide IOP or PHP via telehealth?</p>	<p>Yes, during this crisis you may, if you are delivering the <b>same service</b> via a telehealth platform – i.e., the same frequency and intensity of service, using the same IOP and PHP codes. If you provide the service using a HIPAA-compliant telehealth platform, bill using the GT or 95 modifier and place of service 02.</p> <p>If you use a NON-HIPAA-compliant platform due to the crisis situation or member access issues, bill using the GQ modifier and on the CMS-1500 also use place of service 02.</p> <p>Note: Public-facing sites such as Facebook, TikTok, Twitch, YouTube, etc., should <b>NEVER</b> be used for telehealth.</p> <p>HOWEVER, if you aren't delivering IOP or PHP, and you are not contracted as an outpatient provider but the member requires outpatient care, contact provider services at 1-855-838-7999 so we can refer them to an outpatient provider.</p> <p>If you are contracted for outpatient care, you may bill the outpatient service using the GT or 95 modifier and place of service 02 (HIPAA-compliant platform). If you use a NON-HIPAA-compliant platform due to the crisis situation or member access issues, bill using the GQ modifier and place of service 02.</p> <p>Note: Public-facing sites such as Facebook Live, TikTok, Twitch, YouTube, etc., should <b>NEVER</b> be used for telehealth.</p>
<p>Can I bill for services performed by telephone, related to IOP or PHP?</p>	<p>No, IOP and PHP services are not permitted via telephone. However, member check-in and counseling by telephone is permitted, but should be billed with the outpatient visit code, along with using the GQ modifier and place of service 02.</p>

## Additional Information:

### **Notification of Enforcement Discretion for Telehealth Remote Communications During the COVID-19 Nationwide Public Health Emergency:**

<https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html>

### **Centers for Medicare and Medicaid Services:**

CMS Guidance for Clinicians:

<https://www.cms.gov/About-CMS/Agency-Information/Emergency/EPRO/Current-Emergencies/Current-Emergencies-page>

CMS Provider factsheet for Telehealth:

<https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet>

Telehealth Toolkit for General Practitioners: <https://www.cms.gov/files/document/general-telemedicine-toolkit.pdf>

End-Stage Renal Disease Providers Toolkit Here: <https://www.cms.gov/files/document/esrd-provider-telehealth-telemedicine-toolkit.pdf>

### **Mass Health:**

<https://www.mass.gov/doc/all-provider-bulletin-289-masshealth-coverage-and-reimbursement-policy-for-services-related-to/download>