

Emergency Telehealth Policy

March 20, 2020 (Original Version)

Revisions as of June 30, 2021

The Mississippi Division of Medicaid responsibly provides access to quality health coverage for vulnerable Mississippians.

Confidentiality Note: This document and all attached pages are confidential and/or proprietary to the Mississippi Division of Medicaid, and may contain sensitive information, including, but not limited to, protected health information as defined by the Health Insurance Portability and Accountability Act (HIPAA) of 1996. The information contained in this document and all attached pages is intended for the exclusive use of the intended recipient and/or individual or entity named herein. The use, disclosure, copying, or distribution by any means, to anyone other than the intended recipient without the prior written permission of the Mississippi Division of Medicaid, is strictly prohibited. Any such unauthorized use, disclosure, copying, or distribution may violate federal and/or state privacy laws, including, but not limited to, HIPAA. If you have received this document, or any attached pages, in error, please notify the sender for instructions on how to destroy or return the information without additional disclosure. Thank you for your assistance in the protection of confidential information.

Contents

| Emergency Telehealth Policy | 3 |
|--|---|
| Temporary Telehealth Services | 3 |
| Requirements for the Provision of Temporary Telehealth Services | 4 |
| Telehealth Provider Approval Process | 4 |
| Billing Information for Approved and Temporary Distant Site Providers (where the provider is located) | 5 |
| Billing Information for Approved and Temporary Originating Site Providers (where the beneficiary is located) | 6 |
| Billing Information for Providers Acting Simultaneously as Originating and Distant Sites | 7 |
| Approved Administrative Code | 7 |
| Distant Site Providers | 7 |
| Approved Temporary Telehealth | 7 |
| Approved State Plan | 7 |
| Approved Temporary Telehealth | 7 |
| Guidelines for Community Mental Health Centers (CMHCS and Private Mental Health Centers (PMHCs) Acting as Distant Site Providers | |
| Psychosocial Rehabilitation Services (PSR)1 | 0 |

<u>UPDATES</u>: Effective for dates of service on and after July 1, 2021, providers should refer to the Medicaid State Plan for DOM's coverage of Telehealth Services, except for the Temporary Telehealth Codes listed in the chart on pages 5-6 of this document. Coverage of these Temporary Telehealth Codes will continue through the end of the Mississippi State of Emergency.

Telehealth Security Requirements / HIPPA – To ensure continued access to telehealth services, DOM will continue to allow providers to operate under the enforcement discretion provided by the Office of Civil Rights (OCR) at the United States of Health and Human Services (HSS) on March 17, 2020, for the remainder of the federal public health emergency (PHE).

Emergency Telehealth Policy

In response to the coronavirus outbreak, the Mississippi Division of Medicaid (DOM) is expanding its coverage of telehealth services throughout the state in alignment with Governor Tate Reeves' recommendations on leveraging telemedicine to care for patients while limiting unnecessary travel, clinic visits and possible exposure. For a complete reference to DOM's updated telehealth policy, that includes procedures during States of Emergency, see the Administrative Code section: https://medicaid.ms.gov/administrative-code/emergency-administrative-code-filings/

DOM defines telehealth services as the delivery of health care by an enrolled Mississippi Medicaid provider, through a real-time audio and/or visual communication method, to a beneficiary who is located at a different site. DOM defines the distant site as the physical location of the provider delivering the telehealth service. The beneficiary's physical location at the time the telehealth service is provided is the originating site. During a State of Emergency, a beneficiary's residence is approved as an originating site.

Temporary Telehealth Services

Effective immediately through the end of the public health emergency (PHE), DOM's Emergency Telehealth Policy will allow additional use of telehealth services to combat the spread of Coronavirus Disease 2019 (COVID-19). Details of enhanced services include the following:

Improved Access for Beneficiaries

- A beneficiary may seek telehealth:
 - o From the beneficiary's home with no telepresenter present,
 - From an originating site approved in the State Plan as listed below with a telepresenter present, or
 - o From a temporarily approved originating as listed below with a telepresenter present.

- A beneficiary may use his or her personal cellular device, computer, tablet, or other web camera-enabled device to seek and receive medical care in a synchronous format with a DOM approved distant-site provider.
- Telehealth services do not include service delivery through text messages, email, a web portal, or other formats that do not include audio and/or visual components.

Requirements for the Provision of Temporary Telehealth Services

Temporary telehealth services provided during this period must meet the following criteria:

- The service rendered from the distant site must be safe and medically appropriate for delivery in the originating site.
- Any services provided through telehealth must meet the same standard of care as if provided in person.
- The beneficiary must give either verbal or written consent to receive telehealth services. Providers must document this consent.
- Providers may only bill:
 - o Procedure codes that they are already eligible to bill, and/or
 - The temporary telehealth procedure codes.
- Services not otherwise covered by the Mississippi Division of Medicaid are not covered when delivered via telehealth.
- The availability of services through telehealth does not alter the scope of practice of any health care provider, nor does it authorize the delivery of health care services in a setting or manner not otherwise authorized by law.
- The GT modifier should be used in addition to service/program required modifiers and is not intended to take the place of other modifiers.

Telehealth Provider Approval Process

- Provider types not included in the State Plan as an originating site or the Administrative Code as
 a distant site should contact DOM for approval to serve as a telehealth provider. As provider
 types are approved, this document will be updated under Approved Provider Types (below) to
 reflect newly-approved provider types that will not require further approval.
- If you are a provider type that has not been approved, or you are a provider type approved as
 either a distant site or an originating site, but not both, and you wish to render both types of
 services, please submit your request to Jennifer Grant (<u>Jennifer.Grant@medicaid.ms.gov</u>).
 Please include the following details:
 - Service Provider Name,
 - Service Provider Type,
 - o Current Medicaid Provider Number,
 - o A brief description for how telehealth can be used to serve your patient population,

- Specific telecommunication equipment to be used (personal cellular device, computer, tablet, or other web camera-enabled device) and
- Whether you are seeking to serve as an originating site, a distant site, or both.

Billing Information for Approved and Temporary Distant Site Providers (where the provider is located)

- Non-Face-to-Face Telehealth Services
 - Audio Only Consultation
 - CPT Codes 99441, 99442, and 99443
 - Audio only consultation initiated by an established patient or guardian of an established patient.
 - Professional claims (CMS 1500) should be billed with place of service
 (POS) 02 and do not require a modifier.
 - Virtual Audio Check-In
 - HCPCS Code G2012
 - Brief, audio-only medical discussions with an established patient with a physician or other qualified healthcare professional.
 - Professional claims (CMS 1500) should be billed with POS 02 and do not require a modifier.
 - Store-and-Forward
 - HCPCS Code G2010
 - Remote evaluation of recorded video and/or images submitted by an
 established patient, including interpretation and follow up with the
 patient within a 24-hour period. This service cannot be related to an
 E&M visit that took place within seven (7) days prior to the virtual check
 in, and must not lead to the medical visit within the next 24 hours (or
 the soonest appointment available).
 - Professional claims (CMS 1500) should be billed with place of service
 POS 02. No modifier is required for the use of these codes.
- Face-to-Face Telehealth Services
 - Distant site telehealth providers should bill the appropriate procedure code as if the service is rendered in person and attach the GT modifier and bill with POS 02. Please refer to the Medicaid <u>Fee Schedule page</u> to view FFS reimbursement rates.

| Temporary Telehealth Service Codes | | | |
|------------------------------------|------------------|---------------------------------|-------------------------|
| Code | Code Description | Z1 Fee on File Medicaid Rate | Effective Begin Date |

| G2010 | REMOTE EVALUATION 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 E/M SERVICE PROVIDED WITHIN THE PREVIOUS 7 DAYS NOR LEADING TO AN E/M SERVICE OR PROCEDURE WI | \$10.19 | 3/19/2020 |
|-------|--|---------|-----------|
| 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 SERV | \$12.35 | 3/19/2020 |
| 99441 | TELEPHONE E&M SERVICE BY A PHY OR OTHER QUALIFIED HLTH CARE PROFESSIONAL WHO MAY REPORT E&M SERVICES PROVIDED 5-10 MINS | \$37.29 | 3/1/2020 |
| 99442 | TELEPHONE E&M SERVICE BY A PHYSICIAN OR OTHER QUALIFIED HLTH CARE PROFESSIONAL WHO MAY REPORT E&M SERVICES PROVIDED FOR ESTAB PATIENT 11-20 MINS | \$62.33 | 3/1/2020 |
| 99443 | TELPHONE E&M SERVICE BY A PHYSICIAN OR OTHER QUALIFIED HLTH CARE PROFESSIONAL WHO MAY REPORT E&M SERVICES PROVIDED FOR ESTAB PATIENT 21-30 MINS | \$90.90 | 3/1/2020 |

Billing Information for Approved and Temporary Originating Site Providers (where the beneficiary is located)

• HCPCS code Q3014

- Originating site providers will only be reimbursed for the Telehealth Originating Site Facility
 Fee if no other services are rendered.
- Originating site providers may only bill for an additional service if the provider conducted a separate identifiable E&M visit while the beneficiary was present in the originating site.
- o Inpatient hospitals are not eligible to receive an originating site fee. The originating site fee is included in the hospital's APR-DRG.

Billing Information for Providers Acting Simultaneously as Originating and Distant Sites

 Providers acting simultaneously as both a telehealth distant and originating site to deliver services to a beneficiary can only bill either the originating or distant site fee-for-service rate, not both.

| Approved Administrative Code Distant Site Providers | Approved Temporary Telehealth Distant Site Providers |
|---|---|
| Physicians | MYPAC providers |
| Physician Assistants | Speech Therapists may render services to established patients |
| Nurse Practitioners | Occupational Therapists may render services to established patients |
| Psychologists | Physical Therapists may render services to |
| | established patients |
| Licensed Clinical Social Workers (LCSWs) | Rural Health Clinics (RHCs) |
| Licensed Professional Counselors (LPCs) | Federally Qualified Health Centers (FQHCs) |
| Board-Certified Behavior Analysts (BCBAs) or | |
| Board-Certified Behavior Analyst-Doctorals | |
| (BCBA-Ds) | |
| Community Mental Health Centers (CMHCs)* | |
| Private Mental Health Centers (PMHCs)* | |

^{*}CMHCs/PMHCs acting as a distant site provider should refer to additional billing information found on pages 8-9 of this document.

| Approved State Plan Originating Site Providers | Approved Temporary Telehealth Originating Site Providers |
|--|---|
| Office of a physician or practitioner | Prescribed Pediatric Extended Care (PPEC) |
| | Centers |
| Outpatient Hospital (including a Critical Access Hospital (CAH)) | Inpatient hospital, provided the telepresenter is authorized to carry out the orders of the distant site provider |
| Rural Health Clinics (RHCs) | Schools*, facilitated by a telepresenter acting within their scope of practice or certification, |

| | provided the telepresenter is authorized to carry out the orders of the distant site provider. |
|---|--|
| Federally Qualified Health Centers (FQHCs) | |
| Community Mental Health Centers (CMHCs) | |
| Private Mental Health Centers | |
| Therapeutic Group Homes | |
| Indian Health Service Clinic | |
| School-based clinics, staffed with a physician, | |
| nurse practitioner or a physician assistant | |
| providing well and sick care | |

^{*}Schools are not currently eligible to receive reimbursement for procedure code Q3014 (originating site facility fee). School telepresenters must include a Registered Nurse (RN) who must be employed by the school/school district, FQHC, RHC or private provider; or Licensed Practical Nurse (LPN), Medical Assistant (MA), or Certified Medical Assistant (CMA) who must be employed by the distant site provider.

Guidelines for Community Mental Health Centers (CMHCS and Private Mental Health Centers (PMHCs) Acting as Distant Site Providers

| SERVICE NAME | PROCEDURE CODES |
|---|----------------------------|
| Psychiatric Diagnostic Evaluation | 90791 90792 |
| Assessment | H0031 |
| Brief Behavioral Health Assessment (Screening) | 96127 |
| Evaluation & Management (E/M) | 99201-99205 99211-99215 |
| Nursing Facility Evaluation & Management (E/M) | 99304-99310 |
| Assisted Living Evaluation & Management (E/M) | 99324-99337 |
| Psychotherapy with E/M (must also bill E/M code on separate line) | 90833 90836 90838 |
| Prolonged Service 60 min. | 99354 |
| Prolonged Service 30 min add on | 99355 |
| Treatment Plan Development & Review | H0032 |
| Psychotherapy | 90832 90834 90837 |
| Nursing Assessment | T1002 |
| Family Therapy | 90846 90847 |
| Group Therapy | 90853 |
| Multi-Family Group Therapy | 90849 |
| Interactive Complexity | 90785 |
| Psychological Evaluation (First Hour) | 96130 |
| (Each Additional Hour) | 96131 |
| Psychological Evaluation (First 30 Minutes) | 96136 |
| (Each Additional 30 Minutes | 96137 |
| Targeted Case Management - (management of the case record) | T1017 |
| Assertive Community Treatment (ACT) | H0039 |
| Psychosocial Rehabilitation | H2030 H2017* |
| Crisis Response (Phone rate \$21.88) | H2011 |
| Acute Partial Hospitalization | H0035 |

| Community Support Services (management of the individual) | H0036 H2015* |
|---|--------------|
| Peer Support | H0038 |
| Wraparound Facilitation | H2021 |
| Intensive Outpatient Psychiatric | S9480 |
| MYPAC | H2022 |

<u>NOTE:</u> All Mental Health procedure codes must be billed with the required modifiers used during face-to-face services, as outlined on the appropriate <u>fee schedules</u>. In addition to the required Mental Health modifiers, providers should also append the GT modifier to identify the service was rendered via Telehealth.

*Mental Health Code updates effective 9/1/2020

Psychosocial Rehabilitation Services (PSR)

Psychosocial Rehabilitation is an active treatment program designed to support and restore community functioning and well-being of an adult Medicaid beneficiary who has been diagnosed with a serious and persistent mental disorder. Psychosocial rehabilitation programs must use systematic, curriculum based interventions for skills development for participants. Its purpose is to promote recovery in the individual's community by alleviating psychiatric decompensation, confusion, anxiety, feelings of low self-worth, isolation and withdrawal. Program activities aim to improve reality orientation, social adaptation, physical coordination, daily living skills, coping skills, effective management of time and resources, task completion and activities to incorporate the individual into independent community living. It is oriented toward empowerment, recovery and competency. It is designed to support individuals who require extensive clinical services to support community inclusion and prevent rehospitalization.

Recognizing that individuals with Serious Mental Illness (SMI) receive significant benefits from PSR, especially in this time of social distancing related to COVID-19, DOM is issuing telehealth guidance to allow the PSR (H2030) per fifteen minute code to be submitted with POS 02.

DOM prefers telehealth options that would permit actual visual connection with the member but will accept telephonic sessions. Additionally:

- Extra steps are to be taken at the beginning of the telehealth session to review confidentiality and privacy concerns.
- The members should have the opportunity to participate in at least one hour-long group per day
 on PSR appropriate topics. One hour PSR groups can be offered throughout the day and do not
 have to be consecutive hours. When using the telehealth format, PSR participants are only
 required to participate as long as the individual is able.
- Telehealth only Psychosocial Rehabilitation must be provided by at least one (1) clinical staff member present during the time of program operation/presentation.