TELEHEALTH LEARNING AND CONSULTATION (TLC) TUESDAYS

April 7: Telehealth Billing

PRESENTED BY:

Holly Roberts, Ph.D., Mid-America MHTTC
William Higgins, Ph.D., Munroe-Meyer Institute
JK Costello, M.D., MPH, The Steadman Group
Disclaimer

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Presenters

Holly Roberts, Ph.D., is a licensed psychologist and associate professor in the Department of Psychology at the Munroe-Meyer Institute for Genetics and Rehabilitation. Dr. Roberts is a faculty trainer and a member of the Mid-America MHTTC’s integrated care team. Dr. Roberts practices in an integrated pediatric primary care clinic and has extensive experience facilitating didactic and practical instruction utilizing telehealth in clinical practice.

Dr. William Higgins, Ph.D., LMHP, BCBA-D, is an assistant professor of psychology and Leadership Education in Neurodevelopmental and Related Disorders (LEND) faculty at the Munroe-Meyer Institute for Genetics and Rehabilitation at the University of Nebraska Medical Center. He is also adjunct faculty at the University of Nebraska-Omaha, where he teaches applied behavior analysis. His training is in the clinical applications of behavior analysis, and his practice focuses on using web-based technologies to overcome distance as a barrier to accessing behavioral health services.
Presenters

JK Costello, MD, MPH is a physician/consultant who develops population health models for substance use disorder. He works with publicly-funded health care and public health systems to improve addiction prevention, treatment and recovery. He helps expand medication-assisted treatment (MAT) in Colorado jails, develops value-based payments for MAT for Medicaid health plans, and improves recovery options in rural Colorado. He is an expert on the payment and regulatory landscape for substance use disorder treatment.
Why Telehealth?

• Efficient way to deliver health care
• Effective in meeting patient goals
• Patient Satisfaction is high
• Goals align with the Triple Aim:
  • Improve Patient Experience
  • Better health outcomes
  • Reduces medical costs

• The Better Question is: **Why Not Provide Telehealth?**
Telehealth: Frequently Asked Questions

- One of the most frequently asked questions related to telehealth:

  Will I get paid for telehealth services?
Services Provided via Telehealth

- Live videoconferencing/telephone (synchronous)
  - Provider to patient
    - Family therapy, individual therapy, SUD treatment
  - Provider to provider
- Store and forward (asynchronous)
- Remote Patient Monitoring
- Mobile Health
Steps to Utilizing Telehealth

• Clinical Considerations

• Technical Considerations

• Licensure, Legal and Administrative Considerations

American Telemedicine Association
Practice Guidelines for Video-Based Online Mental Health Services, May 2013
Telehealth: Licensure, Legal and Administrative Considerations

- Qualifications and Training of Providers
- Licensure Laws in Your Organization and State
- Scheduling and Emailing
- Documentation and Record Keeping
- Payment and Billing
- Therapist Privacy and Safety
Telehealth: Licensure, Legal and Administrative Considerations

- Documentation and Record Keeping
  - Maintain a record of each patient you provided services similar to in-person sessions
  - Comply with state and federal laws and regulations
  - Include only relevant information needed for reimbursement
- Documentation relevant to telehealth:
  - Location of the patient
  - Location of the billing provider
  - Delivered via Telehealth
  - Type of Service provided
    - Individual, Family, Group
    - How participants interacted (if applicable)
Telehealth: Licensure, Legal and Administrative Considerations

• (Patient) Payment and Billing
  • Arrangements made with the patient prior to delivery of services
    • Patient needs to check with insurance company on coverage of telehealth services

• (Provider) Payment and Billing
  • NOW…it’s time for you to get paid for what you did!
Will I Get Paid for Telehealth?

• One of the most frequently asked questions
• Billing for telehealth can feel daunting
• Rules for billing vary by:
  • State
  • Payors
  • Service provided
  • Day-to-day changes with Covid-19
• Good news: Covid-19 has loosened restrictions
Telehealth Billing Basics

• Important considerations when billing for telehealth:
  1) Type of Service
  2) Service Billing Codes (CPT codes) associated with Type of Service
  3) Telehealth modifiers
  4) Originating Site (Location of the Patient)
  5) Distant Site (Location of the Provider)
  6) Place of Service (POS)
  7) Relationship with the Patient: New or Existing
Telehealth Billing Basics

1) Type of Service
   • Live Synchronous
     • Provider to Patient
     • Provider to Provider
   • Store and Forward
   • Remote Patient Monitoring
   • Mobile Health
Telehealth Billing Basics

2) Service Billing Codes (CPT codes)
   • Same as in-person
     • Family Therapy (90846, 90847)
     • Individual Therapy (90832, 90834, 90837)
     • Initial Consult (90791)

3) Modifiers
   • Information to the insurance provider on the service provided
   • Helps you get paid according to the service
   • Often 2-letters or 2-number codes (e.g., GT, GQ)

Billing for Telehealth Encounters: AN INTRODUCTORY GUIDE ON FEE-FOR-SERVICE by the Center for Connected Health Policy: The National Telehealth Policy Resource Center
Telehealth Billing Basics

4) Originating Site
   • Location of the Patient
     • Clinic
     • Home

5) Distant Site
   • Location of the Provider and/or
   • Practice qualifications of the provider
Telehealth Billing Basics

6) Place of Service (POS) code
   - CMS publishes these codes
   - POS on the 1500 form, item 24b
   - Where provider and patient were located during an encounter
   - Medicare requires POS 02 code for synchronous telehealth service
   - For some states, the POS is the same as in-person POS because it is viewed as synonymous with in-person visit

7) Relationship with Patient
   - New patient
   - Existing patient
Telehealth and State Licensure Laws

• Consult Licensure Laws in your State
  • **50 State Telehealth Laws and Reimbursement Policies Report (Sept.2019)**, Center for Connected Health Policy: The National Telehealth Policy Resource Center

• **Changes with Covid-19:**
  • Many states have relaxed practice regulations
    • Within state
    • Between states
    • Place of service (patient and provider)

• Center for Connected Health Policy: The National Telehealth Policy Resources Center
  https://www.cchpca.org/
  • Go to “Resources” from the main page to:
    • Covid-19 Telehealth Coverage Policies
    • Covid-19 Related State Actions
Telehealth Payers

- Many major insurance companies pay for Telehealth Services

  - Blue Cross
  - United Healthcare
  - Humana
  - Cigna

  Private

  - Medicare
  - Medicaid

  Public
Telehealth Payers

• *Changes with Covid-19*

  • Most insurance companies are allowing for use of telehealth
    • America’s Health Insurance Plans (AHIP) provides information on insurance company response from A-Z [https://www.ahip.org/health-insurance-providers-respond-to-coronavirus-covid-19/](https://www.ahip.org/health-insurance-providers-respond-to-coronavirus-covid-19/)
  • Some providing payment for telephone and/or videoconferencing
  • Medicare changes (as of March 6)
    • 1135 Waiver
      • Allowing for new patient visits and originating site to be at any medical facility or patient’s home
    • Telehealth visits are considered in-person and paid at the same in-person rate
Telehealth Payers

• *Changes with Covid-19*

• **1135 Waiver**: Center’s for Medicare & Medicaid Service (CMS) allows for an expansion of services
  - As of March 6, 2020: Medicare will pay for initial visits via telehealth and do not have restrictions on place of service or place of patient
    - Physicians, Nurse Practitioners, Licensed Behavioral Health Providers

• **Health Insurance Portability and Accountability Act (HIPAA)**
  - HHS Office of Civil Rights will waive penalties for HIPAA violations for good faith efforts to provide care (FaceTime, Skype)

https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/index.html

Special Considerations: Schools

• Services provided in the schools
  • School counselors, teachers, administrators (not billing insurance)
  • School-based mental health (may be billing insurance)

• Seek out state guidelines, governing boards, district policies

• Follow the same best practices while using web-based technology to connect with students (www.ata.org)
  • Consult guidelines that connect FERPA and HIPAA
  • More of this during the April 21 webinar on Children and Adolescents

Special Considerations: Substance Use Disorders

• Lots of changes on the prescribing/dispensing side
  • Opioid Treatment Programs (OTPs)/methadone clinics
    • Longer takeaways
    • No physical needed for buprenorphine dosing
  • Office-Based Opioid Treatment (OBOT)
    • No in-person physical needed prior to teleprescribing
    • Decreased expectations for compliance monitoring
• Controlled substances can be prescribed via tele on first visit
Special Considerations
Substance Use Disorders

- Fewer changes on the counseling side, although some states allowing billing for tele-groups or Intensive Outpatient (IOP)

- 42 CFR Part 2
  - Applies to substance use treatment facilities
  - 42 CFR Part 2 is suspended in emergencies
  - It is up to you to determine if it's an emergency

Changes in Telehealth During Covid-19

- Changes occur **daily**
  - State Laws
  - Federal Guidance
  - Parity
  - Payers
Telehealth Resources

America’s Health Insurance Plan

- Information on Insurance Company Response to Covid-19 A-Z
  https://www.ahip.org/health-insurance-providers-respond-to-coronavirus-covid-19/

American Medical Association

- Main website: www.ama-assn.org/ama

American Society of Addiction Medicine

- ASAM Confidentiality (42 CFR Part 2)
  - http://www.telehealthresourcecenter.org/toolbox-module/cross-statelicensure
    Resources Continued 3
  - https://www.healthit.gov/providers-professionals/faqs/are-therestate-licensing-issues-related-telehealth
Telehealth Resources

American Telemedicine Association:
- Main website: www.americantelemed.org
- Telehealth Basics https://www.americantelemed.org/resource/why-telemedicine/
Telehealth Resources

Center for Connected Health Policy: The National Telehealth Policy Resources Center:

- Main website: [https://www.cchpca.org/](https://www.cchpca.org/)


Telehealth Resources

Centers for Medicare and Medicaid Services

● Main website: www.cms.gov


Telehealth Resources

Federation of State Medical Boards

● Main website: www.fsmb.org

● Telemedicine Policies by State http://www.fsmb.org/siteassets/advocacy/key-issues/telemedicine_policies_by_state.pdf

Great Plains Telehealth Resource & Assistance Center

● Main website: www.gptrac.org

● Getting started with Telehealth https://gptrac.org/getting-started/plan-ahead/

Telehealth Resources

Health and Human Services (HHS) Resources:

- Main website: hhs.gov


Telehealth Resources

International Society for Mental Health Online
● Main website: www.ISMHO.org

Internet Healthcare Coalition
● Main website: www.ihealthcoalition.org

National Frontier & Rural ATTC
● Main website: www.nfarattc.org
  ○ Technology-Based Clinic Supervision Guidelines
  ○ Telehealth Capacity Assessment Tool TCAT-Is your Agency ready for Telehealth?
Telehealth Resources

SAMHSA:


- SAMHSA Substance Abuse Confidentiality Regulations [samhsa.gov/about-us/who-we-are/lawsregulations/confidentiality-regulations-faqs](https://www.samhsa.gov/about-us/who-we-are/lawsregulations/confidentiality-regulations-faqs)
Telehealth Resources

Telebehavioral Health Institute
- Main website: https://telehealth.org/ethical-statements/

Telehealth Resource Center:
- Main website: https://www.telehealthresourcecenter.org/
- Telehealth Resources: https://www.telehealthresourcecenter.org/resources/
Telehealth Resources

U.S. Department of Education and U.S. Department of Health and Human Services:

- Joint Guidance on the Application of the *Family Educational Rights and Privacy Act (FERPA)* And the *Health Insurance Portability and Accountability Act of 1996 (HIPAA)* To Student Health Records
  
Q&A With Presenters

Holly Roberts, PhD

William Higgins, PhD

JK Costello, MD, MPH