

TELEHEALTH LEARNING AND CONSULTATION (TLC) TUESDAYS

Telehealth Billing, April 10, 2020

Presenters: Holly Roberts, PhD, Mid-America MHTTC
William Higgins, PhD, Munroe-Meyer Institute, Omaha, NE
JK Costello, MD, MPH, The Steadman Group

Participant Question & Presenter Response

Q1 *Where can I find up-to-date information on regulations and billing related to telehealth services?*

A1 With changes being made to policies at a rapid pace to keep up with ever-evolving recommendations related to COVID-19, it is important to stay-up-to date on new regulations. Regulations also differ state to state and plan by plan. Here are two resources that can provide up-to-date information on current and changing policies.

1. [50-State Survey: Temporary Medical Licensure Measures in Response to COVID-19 – Association of American Medical Colleges \(AAMC\)](#)
2. [State Telehealth Laws & Reimbursement Policies – Center for Connected Health Policy \(CCHP\)](#)

Q2 *Where can I find information on the portability of licenses across states and providing telehealth services?*

A2 Although some states have always allowed for the portability of licenses across state lines, during this time, more states are allowing this practice to increase access to services. In some cases, the allowance is only for a certain number of days. To find out more about practicing across state lines, check the following resource.

[50-State Survey: Temporary Medical Licensure Measures in Response to COVID-19 – Association of American Medical Colleges \(AAMC\)](#)

Q3 *Can I provide services via telephone without video and bill for these services?*

A3 Telephone services are being reimbursed more than before, but this still is not universal across all insurance plans. Check your local state Medicaid *and* Medicare regulations for up-to-date information. Private insurance plans will vary in coverage. We still encourage you to look into HIPAA-compliant video options that you can sustain long-term. When video is not an option, telephone services may be necessary to maintain continuity of care.

Q4 For clinicians providing therapy to address substance use disorders, how can you get a release of information on file while not violating 42 CFR part 2?

A4 You can utilize e-signature or verbal consent to get a signed release. Best practice would be to have a backup “witness” for verbal consent, but this may not always be possible at this time. The 42 CFR part 2 also has emergency exemptions.

Q5 How do I make decisions about what services to provide at a time when regulations are changing so rapidly?

A5 Choosing a HIPAA-compliant platform is preferred and offers long-term solutions, but if not available, it is possible to use a non-HIPAA-compliant tool in the short term during physical distancing. When making decisions about what care to offer, it is important to assess clients’ needs and resources and think flexibly about how to support them. Privacy is a primary concern and phone services do offer privacy.

Q6 What are the most common modifiers for telehealth CPT codes?

A6 GT is the predominant modifier for almost all locations and payers. For some payers, GT has been changed to POS 02. They both indicate synchronous telehealth service. The 95 modifier is similar but somewhat archaic.

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