COVID-19 Virtual Visit & Reimbursement Guide - Minnesota

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Partnered with:

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- Federally Qualified Health Centers
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References and Resources
**Definition:** There are three types of telehealth services:
- **Asynchronous Telehealth (Store & Forward)** is the transfer of digital images, sounds, or previously recorded video from one location to another to allow a consulting practitioner (usually a specialist) to obtain information, analyze it, and report back to the referring practitioner. This is a non-interactive telecommunication because the physician or health care practitioner views the medical information without the patient being present.
- **Synchronous Telehealth** is real-time interactive video teleconferencing that involves communication between the patient and a distant practitioner who is performing the medical service. The practitioner sees the patient throughout the communication, so that two-way communication (sight and sound) can take place.
- **Remote Patient Monitoring** is use of digital technologies to collect health data from individuals in one location and electronically transmit that information to providers in a different location for assessment.

For the purposes of this document, the guidelines below are specific to synchronous telehealth with the originating site being the patient’s home, as that will be the most applicable during the COVID-19 pandemic.

**CPT/HCPCS Codes:**
Telehealth eligible CPT/HCPCS codes vary by payor (refer to payor guidelines section).

**Place of Service Codes**
POS 02: Telehealth Provided Other than in Patient’s Home*
- The location where health services and health related services are provided or received, through telecommunication technology. Patient is not located in their home when receiving health services or health related services through telecommunication technology.

POS 10: Telehealth Provider in Patient’s Home-Effective January 1st, 2022
- The location where health services and health related services are provided or received through telecommunication technology. Patient is located in their home (which is a location other than a hospital or other facility where the patient receives care)

*Note-Renamed on January 1st, 2022, previously was only called “Telehealth

During the COVID-19 PHE, many payors are allowing the POS that would have been used if the visit was performed in person to allow for a site of service payment differential

**Reporting Criteria:**
- Report the appropriate E/M code for the professional service provided.
- Communication must be performed via live two-way interaction with both video and audio.
  - During the COVID-19 pandemic, some payors have waived the video requirement.
- All payors had previously required that communications be performed over a HIPAA compliant platform. However, during the COVID-19 pandemic, several payors, including Medicare, have waived this requirement.
  - Refer to the HIPAA Compliant section for more details.

**Documentation Requirements:** Telehealth services have the same documentation requirements as a face-to-face encounter. The information of the visit, history, review of systems, consultative notes, or any information used to make a medical decision about the patient should be documented. In addition, the documentation should note that the service was provided through telehealth, both the location of the patient and the provider, and the names and roles of any other persons participating in the telehealth visit. Obtain verbal consent at the start of the visit and ensure consent is documented. Maintain a permanent record of the telehealth visit in the patient’s medical record.
Definition: Online Digital Evaluation and Management Services (E-Visits) are an E/M service provided by a Qualified Healthcare Professional or an assessment provided by a Qualified Nonphysician Healthcare Professional to a patient using an audio and visual software-based communication, such as a patient portal.

CPT/HCPCS Codes:
Reportable by a Qualified Healthcare Professionals:

- 99421: Online digital evaluation and management service, for an established patient, for up to 7 days, cumulative time during the 7 days; 5-10 minutes.
- 99422: Online digital evaluation and management service, for an established patient, for up to 7 days, cumulative time during the 7 days; 11-20 minutes.
- 99423: Online digital evaluation and management service, for an established patient, for up to 7 days, cumulative time during the 7 days; 21 or more minutes.

Reportable by Qualified Nonphysician Healthcare Professionals (Physical Therapists, Occupational Therapists, Speech Language Pathologists, Clinical Psychologists Registered Dietitian, etc.):

- G2061/98970: Qualified nonphysician healthcare professional online assessment, for an established patient, for up to seven days, cumulative time during the 7 days; 5-10 minutes.
- G2062/98971: Qualified nonphysician healthcare professional online assessment, for an established patient, for up to seven days, cumulative time during the 7 days; 11-20 minutes.
- G2063/98972: Qualified nonphysician healthcare professional online assessment, for an established patient, for up to seven days, cumulative time during the 7 days; 21 or more minutes.

Reporting Criteria:

- Online visits must be initiated by the patient. However, practitioners can educate beneficiaries on the availability of e-visits prior to patient initiation.
- The patient must be established. However, during the COVID-19 pandemic Medicare and some other payors have waived this requirement.
- E-Visit codes can only be reported once in a 7-day period.
- Cannot report when service originates from a related E/M service performed/reported within the previous 7 days, or for a related problem within a postoperative period.
- E-Visits are reimbursed based on time.
  - The 7-day period begins when the physician personally reviews the patient’s inquiry.
  - Time counted is spent in evaluation, professional decision making, assessment and subsequent management.
  - Time is accumulated over the 7 days and includes time spent by the original physician and any other physicians or other qualified health professionals in the same group practice who may contribute to the cumulative service time.
  - Does not include time spent on non-evaluative electronic communications (scheduling, referral notifications, test result notifications, etc.). Clinical staff time is also not included.

Documentation Requirements: These are time-based codes, and documentation must support what the physician did and for how long. Time is documented and calculated over the 7-day duration and must meet the CPTs time requirement. Obtain verbal consent at the start of the visit and ensure the consent is documented. Maintain a permanent record of the telehealth visit in the patient’s medical record.
Definition: A brief check in between a practitioner and a patient via telephone or other audiovisual device to decide whether an office visit or other service is needed. A remote evaluation is recorded video and/or images submitted by an established patient.

CPT/HCPCS Codes:

- 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 service or procedure within the next 24 hours or soonest available appointment; 5-10 minutes of medical discussion.

- 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 within the next 24 hours or soonest available appointment.

- G2250: Remote assessment 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 service provided within the previous 7 days nor leading to a service or procedure within the next 24 hours or soonest available appointment.

- G2251: Brief communication technology-based service, e.g. virtual check-in, by a qualified health care professional who cannot report evaluation and management services, provided to an established patient, not originating from a related service provided within the previous 7 days nor leading to a service or procedure within the next 24 hours or soonest available appointment; 5-10 minutes of clinical discussion.

- G2252: 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 service or procedure within the next 24 hours or soonest available appointment; 11-20 minutes of medical discussion

- G0071: Payment for communication technology-based services for 5 minutes or more of a virtual (non-face-to-face) communication between an rural health clinic (RHC) or federally qualified health center (FQHC) practitioner and RHC or FQHC patient, or 5 minutes or more of remote evaluation of recorded video and/or images by an RHC or FQHC practitioner, occurring in lieu of an office visit; RHC or FQHC only.

Reporting Criteria:

- The patient must be established. However, during the COVID-19 pandemic Medicare and some other payors have waived this requirement.

- Communication must be a direct interaction between the patient and the practitioner. Not billable if performed by clinical staff.

- If the virtual check-in originates from a related E/M provided within the previous 7 days, then the service is considered bundled into that previous E/M and would not be separately billable.

- If the virtual check-in leads to an E/M within the next 24 hours or soonest available appointment, then the service is considered bundled into the pre-visit time of the associated E/M and would not be separately billable.

Documentation Requirements:

Documentation should include medical decisions made, names and roles of any persons participating in the evaluation, and the communication method (telephone, video/audio software, etc.). Obtain verbal consent at the start of the visit and ensure the consent is documented. Maintain a permanent record of the telehealth visit in the patient’s medical record.
**Definition:** A telephone visit is an evaluation and management service provided by a qualified healthcare professional or an assessment and management service provided by a qualified nonphysician health care professional via audio telecommunication.

**CPT/HCPCS Codes:**

Reportable by Qualified Healthcare Professionals:

- **99441:** Telephone evaluation and management service by a physician or other qualified health care professional who may report evaluation and management services provided to an established patient, parent, or guardian not originating from a related E/M service provided within the previous 7 days nor leading to an E/M service or procedure within the next 24 hours or soonest available appointment; 5-10 minutes of medical discussion.
- **99442:** 11-20 minutes of medical discussion.
- **99443:** 21-30 minutes of medical discussion.

Reportable by Qualified Nonphysician Healthcare Professionals (Physical Therapists, Occupational Therapists, Speech Language Pathologists, Clinical Psychologists Registered Dietitian, etc.):

- **98966:** Telephone assessment and management service provided by a qualified nonphysician health care professional to an established patient, parent, or guardian not originating from a related assessment and management service provided within the previous 7 days nor leading to an assessment and management service or procedure within the next 24 hours or soonest available appointment; 5-10 minutes of medical discussion.
- **98967:** 11-20 minutes of medical discussion.
- **98969:** 21-30 minutes of medical discussion.

**Reporting Criteria:**

- Call must be initiated by the patient.
- The patient must be established. However, during the COVID-19 pandemic Medicare and some other payors have waived this requirement.
- Communication must be a direct interaction between the patient and the healthcare professional.
- If the call originates from a related E/M or assessment provided within the previous 7 days, then the service is considered bundled into that previous E/M or assessment and would not be separately billable.
- If the call leads to an E/M or assessment within the next 24 hours or soonest available appointment, then the service is considered bundled into the pre-visit time of the associated E/M or assessment and would not be separately billable.

**Documentation Requirements:**

Documentation should include medical decisions made, the names and roles of any persons participating in the call, and the length of call. Obtain verbal consent at the start of the visit and ensure the consent is documented. Maintain a permanent record of the telehealth visit in the patient’s medical record.
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Payor Specific Key Points:

E-Visits/Telephone/Virtual Check Ins:

- **Allowable Codes:**
  - **E-Visits:** 99421-99423, 98970-98972, G2061-G2063.
  - **Telephone:** 99441-99443, 98966-98968
  - **Virtual Check-Ins:** G2010, G2012

- **Effective Date:** March 6th, 2020-Further Notice
- **Modifier:** None
- **Patient Type:** Established
- **Telephone Reimbursement:** Telephone services (99441-99443) provided March 5th, 2020 through September 30th, 2020 were reimbursed at the same rate as a 99212-99214 E/M office visit (ex. 99441 equaled a 99212 E/M reimbursement). After September 30, 2020, telephone-only services resumed to pre-March 5, 2020 rates.

Telehealth:

- **Allowable Codes:** See table below
  - **Wellness:** Appropriate E/M codes with a wellness diagnosis for wellness aspects of the visit done via telehealth will be covered. Preventative visit codes should be billed when routine in-office visits can resume, and the remaining parts of the well visit can be completed. Both services will be fully reimbursed, and the patient will not incur a cost share.

- **Effective Date:**
  - Expanded telehealth code set: March 6th, 2020-Further Notice
  - Original telehealth code set: N/A

- **HIPAA Compliant Platform:** Non-HIPAA compliant, non-public facing software can be utilized for telehealth visits, such as Skype & FaceTime.

- **Modifiers/POS:**
  - **Commercial:**
    - 1500: POS 02 with modifier GT for CMS recognized CPTs or modifier 95 for AMA Appendix P.
    - UB: Modifier GT or 95
  - **Medicare Advantage:**
    - 1500: POS that would have been used if the service were performed in person (e.g. POS 11) with modifier 95.
    - UB: Modifier 95

- **Not Reimbursable:**
  - Asynchronous Telemedicine Services (services reported w/ GQ modifier).
  - Services that do not include direct patient contact, such as physician standby services.

- **Provider Type:** Not specified
  - Aetna will allow physicians to provide care from any location, including the provider’s home.

- **Reimbursement:** Reimbursement will be at the same rate as in-person face-to-face visits, refer to your Aetna contract for allowable rates.

- **Capitation:** Telemedicine will be covered within the capitation agreement, similar to an in-office visit

- **Transmission & Originating Site Fees:** For their commercial product, T1014 and Q3014 are not eligible for payment, Aetna considers these services as incidental to the charges associated with the E/M. For their Medicare Advantage product Aetna will allow an originating site fee (Q3014) as appropriate.

- **Video Component:** The telehealth video component is required, except on codes indicated below that can be provided over audio only.

**Cost Share Waiver:**

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• Commercial:
  o Effective March 6th, 2020 through June 4th, 2020, Aetna will waive member cost sharing for in-network telemedicine visits, regardless of diagnosis.
  o Effective June 5th, 2020 through January 31st, 2021, Aetna will waive member cost sharing for in-network telemedicine visits for behavioral and mental health counseling services only.
  o Self-insured plans can opt-out at their discretion.

• Medicare Advantage:
  o Effective March 6th, 2020 through May 13th, 2020, Aetna will waive member cost sharing for in-network telemedicine visits, regardless of diagnosis.
  o Effective May 13th, 2020 through January 31st, 2021 Aetna will waive member out-of-pocket costs for all in-network primary care and specialist visits, regardless of diagnosis.
  o Effective January 31st, 2021 through March 31st, 2021, Aetna will waive member cost sharing for non-network telehealth visits for primary care and behavioral health.

Both Commercial & Medicare Advantage:

• Effective March 6th, 2021, through End of PHE: Aetna will waive cost sharing for COVID-19 testing-related services, which are medical visits that result in an order for or administration of a COVID-19 test; are related to furnishing or administering such a test or to the evaluation of an individual for purposes of determining the need for such a test.

### AETNA ELIGIBLE TELEHEALTH CODES

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**Payor Specific Key Points**

### E-Visits/Telephone/Virtual Check-In:

- **Allowable Codes:**
  - E-Visits: 99421-99423, 98970-98972, G0071, G2251
  - Telephone: 98966-98968, 99441-99443
  - Virtual Check-In: G2010, G2012, G2250, G2252, S.320
- **Modifier:** None
- **Patient Type:**
  - E-Visits: Established
  - Telephone & Virtual Check-In: New & Established. BCBS MN is waiving the established only patient restriction for telephone visits through end of PHE.
- **E-Visit Criteria:** BCBS MN allows E-visits to be performed via real time internet communication or patient-initiated e-mail. For e-mail communication to be covered, the following criteria must be met:
  - In the judgment of the provider, the E-visit is medically necessary and involved sufficient resource use, time, and complexity to warrant separate recognition as a unique event.
  - Written documentation related to the service must be included in the patient’s medical record and should include the following:
    - Documentation must support, at minimum, a 99212 level E/M,
    - Medical information exchange, assessment, and plan of treatment/care (for example, symptoms, counseling)
    - Services must be billed under the rendering practitioner’s provider number or NPI
  - Provider responds within one business day **AND one or more of the following:**
    - Patient describes new symptoms and is requesting intervention and/or advice from provider to treat new symptoms
    - Patient describes ongoing symptoms from a recent acute problem or chronic health problem and is requesting intervention and/or advice from provider to treat ongoing acute problem or chronic health problem
    - Evidence that provider is giving detailed medical advice, revising treatment plan, prescribing/revising medication, recommending additional testing, and/or providing self-care/patient education information for new and/or chronic health problem
    - Evidence that provider is making a new diagnosis and is prescribing new treatment
    - Patient requesting interpretation of lab and/or test results with evidence that provider is providing meaningful explanation and recommendations to modify treatment plan, revising medications, etc.
    - Evidence that provider is providing extended personal patient counseling that is changing the course of treatment and impacting the potential health outcome.

### Telehealth:

- **Allowable Codes:** See table below
- **Effective Date:** Permanent Policy
- **HIPAA Compliant Platform:** Non-HIPAA Compliant, such as Skype & FaceTime software, can be utilized for telehealth visits through end of PHE.
- **Modifiers/POS:**
  - **Commercial Professional (1500) Claims:** POS 02 and modifier 95. BCBS will also accept claims billed with the POS that would have been used if the service were performed in person with a modifier 95. Seeking clarification to ensure reimbursement will be at made at the in-person rate, regardless if POS 02 is used.
  - **Medicare Professional (1500) Claims:** POS that would have been used if service were performed in person and modifier 95. If POS 02 is utilized it will result in the lower facility place of service allowance.
  - **Facility (UB) Claims:** Append modifier GT or 95.
o **Modifier CS**: BCBS MN will accept claims submitted with a modifier CS for dates of service effective 3/18/2020, however the modifier itself will not be used to determine if a waiver of member cost sharing is applied.

- **Not Covered**: Pre-recorded consultations and provider to provider consultations are not covered.
- **Patient Type**: New & Established. BCBS MN is waiving the established only patient restriction for telehealth visits through PHE.
- **Patient Location**: Patient can be located at home or at an allowable originating site facility.
- **Preventive Care Services**: BCBS MN will allow for preventive care services (99381-99387, 99391-99397) to be provided via telehealth during the COVID-19 PHE. Providers can provide all portions of the service over telehealth, if appropriate. If a portion of the service requires face to face interaction that portion can be provided at a later date, however only one preventive visit can be billed for both the in person and telehealth interaction.
- **Provider Type**: Not Specified
- **Reimbursement**: Reimbursement will be at the same rate as in-person face-to-face visits, refer to your BCBS MN contract for allowable rates.
- **Transmission & Originating Site Fees**: If patient presents to an allowable originating site facility, the facility can bill Q3014 with revenue code 780. BCBS MN has not issued guidance on transmission fees.
- **Video Component**: BCBS MN is waiving the video component requirement for telehealth until the end of the PHE.
  o BCBS MN has specifically stated that if providers are providing care over the phone that typically had been performed face to face, then the telehealth codes should be utilized instead of the telephone codes.

### Cost Share Waiver:

Effective February 4th, 2020 until Further Notice, BCBS MN is waiving cost sharing for COVID-19 related visits, testing, treatment for their Medicare and Commercial lines.

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Page 14
Payor Specific Key Points

Effective January 1st, 2021

E-Visits/Telephone/Virtual Check Ins:

- **Allowable Codes:**
  - **E-Visits:** Not Allowable
  - **Telephone:** 99441-99443
  - **Virtual Check-Ins:** G2012-temporary reimbursable until further notice
- **Effective Date:** Effective January 1st, 2021 Cigna implemented a permanent Virtual Care Policy.
- **Modifier:** None
- **POS:** Utilize POS 02
- **Patient Type:** Established

**E-Consults:**

Cigna recognizes E-Consult codes, which occurs when a treating health provider seeks guidance from a specialist physician through electronic means (phone, internet, EHR consultation, etc.)

- **Allowable Codes:** 99446-99452
- **Effective Date:** March 2nd, 2020- further notice
- **Modifier:** No modifier, unless COVID-19 related, then utilize modifier CS.
- **POS:** Utilize POS 02
- **Patient Type:** New or Established
- **Non-Billable:**
  - If the consultation to a transfer of care or other face-to-face service (e.g., a surgery, a hospital visit, or a scheduled office evaluation of the patient) within the next 14 days or next available appointment date of the consultant, these codes should not be billed.
  - If the consultation lasted less than 5 minutes.
  - If the consultation was for the sole purpose to arrange transfer of care or a face to face visit.

**Telehealth:**

- **Allowable Codes:** See below table for allowable telehealth codes.
  - Cigna will reimburse telehealth when ALL of the following are met:
    - Services must be provided over an interactive audiovisual connection.
      - Services rendered via telephone only are considered interactive and will be reimbursed when the appropriate telephone only code is billed.
    - Service would be reimbursable if the service were provided face-to-face.
    - The patient and/or actively involved caregiver must be present on the receiving end and the service must occur in real time.
    - All technology used must be secure and meet or exceed federal and state privacy requirements.
    - A permanent record of online communications relevant to the ongoing medical care and follow up of the customer is maintained as part of the customer’s medical record as if the service were provided as an in-office visit.
    - The permanent record must include documentation which identifies the virtual service delivery method. I.e.: audio/video or telephone only.
    - All services provided are medically appropriate and necessary.
    - The evaluation and management services (E/M) provided virtually must meet E/M criteria as defined in the 1997 Centers for Medicare and Medicaid Services (CMS) Documentation guidelines for codes outside of the 99202 through 99215 range and the 2021 CPT E/M documentation guidelines outlined by the American Medical Association for codes within the range 99202 through 99215.
- The patient’s clinical condition is of low to moderate complexity, and while it may be an urgent encounter, it should not be an emergent clinical condition.
- Services must be provided by a health care professional who is licensed, registered, or otherwise acting within the scope of his/her licensure.
- Services must be billed on a 1500 form or electronic equivalent.

- **Effective Date:** Effective January 1st, 2021 Cigna implemented a permanent Virtual Care Policy.

- **Excluded Services:**
  - Service occurs on the same day as a face to face visit, when performed by the same provider and for the same condition.
  - Services billed within the post-operative period of a previously completed major or minor surgical procedure will be considered part of the global payment for the procedure and not reimbursed separately.
  - Services performed via asynchronous communications systems (e.g., fax).
  - Store and forward telecommunication [transferring data from one site to another through the use of a camera or similar device that records (stores) an image that is sent (forwarded) via telecommunication to another site for consultation] whether an appropriate virtual care modifier is appended to the procedure code or not.
  - Communications are incidental to E/M services, counseling, or medical services included in this policy, including, but not limited to reporting of test results and provision of educational materials.
  - Administrative matters, including but not limited to, scheduling, registration, updating billing information, reminders, requests for medication refills or referrals, ordering of diagnostic studies, and medical history intake completed by the patient.
  - Urgent Care centers will not be reimbursed for virtual care under the Cigna’s virtual care policy.

- **HIPAA Compliant Platform:** All technology used must be secure and meet or exceed federal and state privacy requirements.
  - However, until further notice providers may use non public facing, non-HIPAA compliant platforms, such as FaceTime, Skype, Zoom, etc).

- **Modifiers/POS:**
  - **Announced October 2021:**
    - **Professional/1500 Claims:** POS 02 and modifier 95
    - **Facility/UB Claims:** Modifier 95
      - Services billed on a UB-04 claim will not be reimbursed under Cigna's virtual care policy. However, Cigna will temporarily reimburse virtual care services billed on a UB-04 through December 31st, 2021.
      - Note: Intensive outpatient program (IOP) telehealth services were covered prior to the pandemic, and will continue to be covered
  - **Prior to October 2021:**
    - **Professional/1500 Claims:** POS that would have been used if the service were performed in person (e.g. POS 11) and modifier 95 or GT.
    - **Facility/UB Claims:** Services billed on a UB-04 claim will not be reimbursed under Cigna’s virtual care policy. However, Cigna will temporarily reimburse virtual care services billed on a UB-04, until further notice, when the service is:
      - Reasonable to be provided in a virtual setting; and
      - Reimbursable per a provider’s contract; and
      - Synchronous audiovisual technology is utilized (except for CPTs 99441-99443)
  - **COVID-19 Related Telehealth Care:**
    - Suspected or Likely COVID-19 Exposure: ICD-10 Z03.818, Z20.822 or Z20.828, CS modifier, and GT or 95 modifier.
    - Confirmed COVID-19 Case: ICD-10 U07.1, J12.82, M35.81, M35.89, and 95 modifier

- **Patient Type:** New or established patients.
- **Provider Type:** Providers who are licensed, registered, or otherwise acting within the scope of their licensure may provide telehealth services.
- **Reimbursement:** Reimbursement will be at the same rate as in-person face-to-face visits, refer to your Cigna contract for allowable rates.
- **Video Component:** An audiovisual connection is required except for telephone codes.
- **Transmission & Originating Site Fees:** Cigna will not reimburse an originating site of service fee or facility fee for telehealth visits (HCPCS Q3014). Cigna will also not reimburse transmission fees; transmission of digitalized data is considered integral to the procedure performed and is not separately reimbursable.

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### Cost Share Waiver:


Effective March 13th, 2020 through January 15th, 2022, Cigna will waive member cost sharing for diagnostic testing and office visits/telehealth visits related to assessment and administration of diagnostic testing. Cigna will also waive member cost sharing for all virtual screening telephone consults (regardless of DX).

Effective March 13th, 2020 until further notice, Cigna will also waive member cost sharing for all virtual screening telephone consults (regardless of DX).

Effective January 1st, 2022, cost sharing will apply for e-consults

**Effective March 2nd, 2020-December 31st, 2020**

### E-Visits/Telephone/Virtual Check Ins:

- **Allowable Codes:**
  - **E-Visits:** Check Provider Fee Schedule
  - **Telephone:** Check Provider Fee Schedule
  - **Virtual Check-Ins:** G2012 (Cigna classifies a Virtual Check-In as “5-10-minute virtual screening telephone consult”)
- **Effective Date:** March 2nd, 2020-January 21st, 2021
- **Modifier:** None
- **Patient Type:** Established

### E-Consults:

Cigna recognizes E-Consult codes, which occurs when a treating health provider seeks guidance from a specialist physician through electronic means (phone, internet, EHR consultation, etc.)

- **Allowable Codes:** 99446-99452
- **Effective Date:** March 2nd, 2020-January 21st, 2021
- **Modifier & POS:** No modifier, unless COVID-19 related, then utilize modifier CS. POS used if visit was performed in person.
- **Patient Type:** New or Established
- **Non-Billable:**
  - If the consultation to a transfer of care or other face-to-face service (e.g., a surgery, a hospital visit, or a scheduled office evaluation of the patient) within the next 14 days or next available appointment date of the consultant, these codes should not be billed.
Telehealth:

- **Allowable Codes**: Cigna will allow any existing face-to-face service on a provider’s fee schedule to be performed and billed via telehealth.
  - **Level Four & Five Codes**: Cigna has encouraged providers to bill the appropriate E/M code that was performed; however, providers should be cognizant when billing level four and five codes for virtual services. Cigna will reimburse these services consistent with face-to-face rates but will monitor the use of level 4 and 5 codes and audit as necessary.
  - **Inappropriate Virtual Services**: Cigna will closely monitor and audit claims for inappropriate services that should not be performed virtually (including but not limited to: acupuncture, all surgical codes, anesthesia, radiology services, laboratory testing, administration of drugs and biologics, infusions or vaccines, and EEG or EKG testing).
  - **Urgent Care Centers**: Virtual care services are covered, including S9083 for services that require a more complex telephone call. Cigna will reimburse the full face to face rate of insured and NON-ERISA ASO providers where telehealth parity laws exist. For all other providers, Cigna will reimburse urgent care centers a flat rate of $88.00 per visit.
- **Effective Date**: March 2nd, 2020-December 31st, 2020.
- **HIPAA Compliant Platform**: Telehealth visits can be performed via non-compliant HIPAA platforms, such as FaceTime, Facebook Messenger, Skype, and Google Hangouts.
- **Modifiers/POS**:
  - **Professional/1500 Claims**: Modifiers GT or 95 with POS that would have been used if service had been provided in-person. DO NOT use POS 02 for virtual visits, as that will result in reduced payment or denied claims.
  - **Facility/UB Claims**: Appropriate revenue code and modifiers GT or 95
  - **COVID-19 Related Telehealth Care**:
    - Suspected or Likely COVID-19 Exposure: ICD-10 Z03.818 or Z20.828, CS modifier, and GT or 95 modifier.
    - Confirmed COVID-19 Case: ICD-10 U07.1
  - **DX Code Placement**:
    - Cigna does not require any specific placement for COVID-19 DX codes, however they recommend providers place the COVID-19 DX code for confirmed or suspected cases in the first position when the primary reason for the visit is to determine if the patient has COVID-19.
    - For services where COVID-19 is not the reason for visit (ex.-labor/delivery), but the patient is also tested for COVID-19, the provider should bill the DX code specific to the primary reason for visit in the first position, and the COVID-19 DX code in any position after the first.
- **Patient Type**: New or established patients.
- **Provider Type**: If the provider can deliver the service in a clinic/facility setting, then they can also provide the service virtually. Providers should bill virtual visits on the same form they usually do (UB/1500) for in-person visits.
- **Reimbursement**: Reimbursement will be allowed at 100% of the provider's contracted rate, refer to your Cigna contract for allowable rates.
- **Video Component**: Telehealth codes can be performed over an audiovisual or audio only connection.
- **Transmission & Originating Site Fees**: Cigna will not reimburse an originating site of service fee or facility fee for telehealth visits (HCPCS Q3014). Cigna will also not reimburse for transmission fees.

**Cost Share Waiver**:

- Effective March 13th, 2020 through January 21st, 2021, Cigna will waive member cost sharing for diagnostic testing and office visits/telehealth visits related to assessment and administration of diagnostic testing. Cigna will also waive member cost sharing for all virtual screening telephone consults (regardless of DX).
- Effective March 30th, 2020 through December 31st, 2020, Cigna will waive member cost sharing for all COVID-19 related treatment.
Payor Specific Key Points:

**E-Visits/Telephone/Virtual Check Ins:**

- **Allowable Codes:**
  - E-Visits: 99421-99423, 98970-98972, G2061-G2063.
  - Telephone: 98966-98968, 99441-99443
  - Virtual Check-In: G2010, G2012
- **Effective Date:** March 6th, 2020-Permanent Policy
- **Modifier:** None
- **Patient Type:**
  - Telephone & Virtual Check-In: Established
  - E-Visits: New & Established
- **E-Visit Exclusions:**
  - Provider initiated email, appointment scheduling, refilling or renewing existing prescriptions without substantial change in clinical situation, scheduling diagnostic tests, reporting test results, updating patient information, providing educational materials, brief follow-up of a medical procedure to confirm stability of the patient’s condition without indication of complication or new condition including, but not limited to, routine global surgical follow-up, brief discussion to confirm stability of the patient’s chronic condition without change in current treatment, when information is exchanged and the patient is subsequently asked to come in for an office visit, a service that would similarly not be charged for in a regular office visit, reminders of scheduled office visits, requests for a referral, consultative message exchanges with an individual who is seen in the provider’s office immediately afterward, clarification of simple instructions or issues from a previous visit.

**Telehealth:**

- **Allowable Codes:** See table below for specific codes. Medica has provided a list of examples of allowable telehealth services, including, but not limited to the following:
  - Consultations
  - Telemedicine consults: emergency department or initial inpatient care
  - Subsequent hospital care services
  - Subsequent nursing facility care services
  - End stage renal disease services
  - Individual medical nutrition therapy
  - Individual and group diabetes self-management training
  - Smoking cessation
  - Alcohol and substance abuse (other than tobacco) structured assessment and intervention services
  - Individual psychotherapy
  - Psychiatric diagnostic interview examinations
  - Family psychotherapy with or without patient present
- **Wellness Visits:** Effective June 1st, 2020, Medica is allowing preventive visits to be provided via telehealth utilizing CPTs 99381-99387 and 99391-99397. Providers may perform all or portions of a preventive visit that can be done appropriately and effectively via telehealth. Services that require face-to-face interaction may be provided at a later date, however, providers may only bill one preventive medicine code to cover both the portion done via telehealth and any necessary face-to-face interaction associated with the preventive care service.
- **Effective Date:** March 6th, 2020- January 31st, 2022
- **HIPAA Compliant Platform:** Telehealth visits can be performed via non-compliant HIPAA platforms, such as FaceTime, Facebook Messenger, and Skype.
- **Modifiers/POS:**
  - Professional (1500) Claims:
o waivers for specific patients, as the cost share waiver for telehealth may vary by plan.

• Facility (UB) Claims: Utilize modifier GT or 95.
• COVID-19 Related: For services relating to the order for or administration of a COVID-19 diagnostic test or for services related to the evaluation of an individual for purposes of determining the need for diagnostic testing, append modifier CS.

• Patient Type: Not Specified.
• Reimbursement: Reimbursement will be at the same rate as in-person face-to-face visits, refer to your Medica contract for allowable rates.
• Store and Forward Telehealth: Medica allows both synchronous (interactive audiovisual communication) and asynchronous (store and forward).
• Originating Sites:
  o Allowable originating sites:
    ▪ Office of physician or practitioner; hospital (inpatient or outpatient); home; critical-access hospital (CAH); rural health clinic (RHC) and federally qualified health center (FQHC); hospital-based or CAH-based renal dialysis center (including satellites); skilled nursing facility (SNF); end-stage renal disease (ESRD) facilities; community mental health center; Residential Substance Abuse Treatment Facility; and other eligible medical facilities.

• Transmission & Originating Site Fees: Transmission fees (HCPCS T1014) are not eligible for payment, however Medica will allow an originating site fee (HCPCS Q3014) to be billed by an originating site facility.
• Telehealth Coverage Limitations: The following are not covered under telemedicine:
  ▪ Provider initiated e-mail, refilling or renewing existing prescriptions, scheduling a diagnostic test or appointment, clarification of simple instructions or issues from a previous visit, reporting test results, reminders of scheduled office visits, requests for a referral, non-clinical communication (i.e. Updating patient information), providing educational materials, Brief follow-up of a medical procedure to confirm stability of the patient’s condition without indication of complication or new condition including, but not limited to, routine global surgical follow-up, brief discussion to confirm stability of the patient’s chronic condition without change in current treatment, when information is exchanged and the patient is subsequently asked to come in for an office visit, a service that would similarly not be charged for in a regular office visit, consultative message exchanges with an individual who is seen in the provider’s office immediately afterward, communication between two licensed health care providers that consists solely of a telephone conversation, email or facsimile, communications between a licensed health care provider and a patient that consists solely of an e-mail or facsimile.
• Video Component: See below matrix for codes that can be performed over an audio only connection.

Cost Share Waiver:

o Effective March 1st, 2020 through January 31st, 2022 Medica will waive cost-sharing for in-network telehealth visits when related to administration of a COVID-19 test. Utilize the Medica provider portal for details regarding cost-share waivers for specific patients, as the cost share waiver for telehealth may vary by plan.

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**Medica Allowable Telehealth Codes**

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**Codes Highlighted in Blue** - Require an Audiovisual Connection

**Codes Highlighted in Green** - Can Be Performed via an Audio only (Telephone) or Audiovisual Connection

*Disclaimer: Although the data found here has been produced and processed from payor sources believed to be reliable, no warranty expressed or implied is made regarding accuracy, adequacy, completeness, legality, reliability, or usefulness of any information.*
**Payor Specific Key Points:**

**E-Visits/Telephone/Virtual Check Ins:**

- **Allowable Codes:**
  - E-Visits: 99421-99423, G2061-G2063
  - Telephone: 99441-99443, 98966-98968
  - Virtual Check-In: G2010, G2012, G2250-G2251, G2252

- **Effective Date:**
  - E-Visits & Virtual Check-Ins: Permanently Allowed
  - Telephone: March 6th, 2020-End of PHE

- **Modifier:**
  - E-Visits & Virtual Check-Ins: None
  - Telephone: Modifier 95

- **Patient Type:** New & Established (New patients allowable only for COVID-19 PHE)

- **Provider Type:**
  - E-Visits (G2061-G2063) Virtual Check-In (G2250 & G2251): Effective January 1st, 2021 Medicare clarified that licensed clinical social workers, clinical psychologists, physical therapists (PTs), occupational therapists (OTs), and speech-language pathologists (SLPs) can furnish E-Visits (G2061-G2063) and Virtual Check-Ins. Medicare created two new HCPCS codes, G2250 & G2251, for virtual check-ins for these provider types.

- **Telephone Services Reporting:** When providers are providing an E/M service that would otherwise be reported as an in-person or telehealth visit, using audio-only technology, providers should utilize the appropriate telephone E/M code (99441-99443), not the in person or telehealth visit code.

- **Telephone Reimbursement Change:** Effective March 1st, 2020, CMS has increased payments for telephone visits to match payments for similar office and outpatient visits.

**Telehealth:**

- **Allowable Codes:** See table below for all codes allowable via telehealth.
  - Note- Telehealth rules do not apply when the beneficiary and the practitioner are in the same location and are utilizing telehealth to reduce exposure risks, even if audio/video technology assists in furnishing a service.

- **Effective Date:**
  - Effective March 6th, 2020-End of COVID-19 PHE:
    - CMS implemented an 1135 blanket waiver for Medicare telehealth services. This waiver allows for additional flexibilities in Medicare telehealth services. Specifically, Medicare will pay for office, hospital, and other visits furnished via telehealth across the country, whether urban or rural, and in all settings, including in patients’ homes. Prior to this waiver, Medicare required telehealth to originate from a healthcare facility within a rural area.
  - Effective January 1st, 2022-Permanent Policy:
    - CMS added a patient’s home as an originating site for patients receiving mental health services via telehealth. “Home” includes temporary lodging. Must meet the following requirements:
      - The provider (or another provider in the same practice and subspecialty) has conducted an in-person (non-telehealth) visit within 6 months
      - The services are medically necessary
      - After the initial tele-mental health visit, the provider must conduct an in-person visit at least once every 12 months
        - However, this visit is not required if the patient and provider consider the risks of an in-person visit and agree that the risks outweigh the benefits
        - Provider should document decision in the patient’s medical record
• **HIPAA Compliant Platform:** Effective March 17th, 2020-End of COVID-19 PHE, the HHS Office for Civil Rights (OCR) will waive penalties for HIPAA violations against health care providers that serve patients in good faith through everyday communications technologies, such as FaceTime.

• **Hospitals-CAH & PPS:** See “Hospital” section for details on Medicare telehealth hospital regulations.

• **Modifiers/POS:**
  - **Professional (1500) Claims:** POS that would have been used if the visit were provided in person with modifier 95.
  - **CAH Method II (UB) Claims:** Modifier GT
  - **CAH & PPS PT/OT/Speech UB Claims:** Modifier 95
  - **PPS Facility (UB) Claims:** PN or PO modifier with condition code DR. Appropriate use of the PN and PO modifier is dependent on your specific services and locations. See the “hospital” section for details.
  - **COVID-19 Related:** If COVID-19 Part B related services were performed also append a CS modifier to applicable line items.
  - **DR Condition Code & CR Modifier:** For all services relating to a COVID-19 waiver, except telehealth services, append the “DR” condition code (UB claims) or “CR” modifier (1500 claims).

• **Patient Type:** As part of the CARES Act, practitioners can provide telehealth services to both new and established patients.

• **Provider Type:** All health care practitioners who are authorized to bill Medicare for their professional services may also furnish and bill for telehealth services. This allows health care professionals who were not previously authorized under the statute to furnish and bill for Medicare telehealth services, including physical therapists, occupational therapists, speech language pathologists, and others, to receive payment for Medicare telehealth services.
  - There are no payment restrictions on distant site providers furnishing Medicare telehealth services from their home during the PHE. Report the place of service code that would have been reported had the service been furnished in person.
  - Direct supervision may be provided using real-time, interactive audio and video technology through the later of the end of the calendar year in which the PHE ends or December 31, 2021.

• **Reimbursement:** Reimbursement will be at the same rate as in-person face-to-face visits, refer to the Medicare fee schedule for allowable rates.
  - **Site of Service Differential:** Prior to CMS-1744-IFC, services that had a site differential (facility versus office), were paid on the facility payment rate when services were furnished via telehealth. Effective March 1st, 2020, CMS now allows physicians’ offices to be paid at the office rate.
    - Providers should report the POS code that would have been reported had the service been furnished in person.
    - CMS is maintaining the facility payment rate for services billed using the POS code 02 if providers choose to not change their current billing practices.

• **Removal of Frequency Limitations on Medicare Telehealth:** Per CMS, the following services no longer have limitations on the number of times they can be provided by telehealth:
  - A subsequent inpatient visit can be furnished via telehealth, without the limitation that the telehealth visit is once every three days (CPT codes 99231-99233).
  - A subsequent skilled nursing facility visit can be furnished via telehealth, without the limitation that the telehealth visit is once every 30 days (CPT codes 99307-99310).
    - Effective January 1st, 2021 Medicare has permanently changed the frequency limitation of subsequent skilled nursing visits to one visit every 14 days.
  - Critical care consult codes may be furnished by telehealth beyond the once per day limitation (CPT codes G0508-G0509).

• **Rural Health Clinics & Federally Qualified Health Centers:** See the RHC and FQHC section for specific billing regulations.

• **Transmission/Originating Site Fees:** Medicare does not reimburse for transmission fees. If applicable, Medicare will reimburse an originating site fee (HCPCS Q3014).
  - Effective April 30th, 2020 through the end of the PHE:
Hospitals may bill as the originating site for telehealth services furnished by hospital-based practitioners to Medicare patients registered as hospital outpatients, including when the patient is located at home.

- **Video Component:** See the “Medicare Telehealth Allowable Codes” below for codes that can be performed via an audio only connection during the COVID-19 PHE only.
  - Effective January 1st, 2022:
    - Medicare redefined “interactive telecommunications system” definition to include interactive, real-time, two way audio-only technology for telehealth services for mental health disorders
    - Audio only mental health telehealth will be reimbursable if:
      - The provider has the technical capability, at the time of the service, to use an interactive telecommunications system
      - The patient is incapable of, or fails to consent to, the use of video technology for the service
      - The beneficiary is located at his or her home
      - The practitioner documents the reason for using audio-only technology uses the appropriate service level modifier

**Cost Share Waiver:**
- The Families First Coronavirus Response Act waives cost-sharing under Medicare Part B (coinsurance and deductible). Therefore, cost-sharing does not apply for COVID-19 testing-related services, which are medical visits that: are furnished between March 18, 2020 and the end of the PHE that result in an order for or administration of a COVID-19 test; are related to furnishing or administering such a test or to the evaluation of an individual for purposes of determining the need for such a test; and are in any of the following categories of HCPCS evaluation and management codes: Office and other outpatient services, hospital observation services, emergency department services, nursing facility services, domiciliary, rest home, or custodial care services, home services, online digital evaluation, and management services.

Use these HCPCS codes for billing:
- Physicians and non-physician practitioners
- Outpatient Prospective Payment System (OPPS)
- RHCs and FQHCs
- CAHs: use OPPS codes
- Method II CAHs: use the OPPS list or the physician and non-physician practitioner list, as appropriate.

- Cost-sharing does not apply to the above medical visit services for which payment is made to:
  - Hospital Outpatient Departments paid under the Outpatient Prospective Payment System, Physicians and other professionals under the Physician Fee Schedule, Critical Access Hospitals (CAHs), Rural Health Clinics (RHCs), Federally Qualified Health Centers (FQHCs).
  - Providers who bill for Medicare Part B services should use CS modifier on applicable claim lines.
  - Providers should NOT charge Medicare patients any co-insurance and/or deductible amounts for these services.

### 2020 MEDICARE ELEGIBLE TELEHEALTH CODES

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Codes Highlighted in Blue - Require an Audiovisual Connection
Codes Highlighted in Green - Can Be Performed via an Audio only (Telephone) or Audiovisual Connection
Codes Highlighted in Yellow - Have a Medicare Payment Limitation (See Table Below)

2021 MEDICARE ELEGIBLE TELEHEALTH CODES

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**Codes Highlighted in Blue** - Require an Audiovisual Connection

**Codes Highlighted in Green** - Can Be Performed via an Audio only (Telephone) or Audiovisual Connection during the COVID-19 PHE ONLY

**Codes Highlighted in Yellow** - Have a Medicare Payment Limitation (See Table Below)

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### 2022 MEDICARE ELEGIBLE TELEHEALTH CODES

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**Payor Specific Key Points**

**E-Visits/Telephone/Virtual Check Ins:**

- **Allowable Codes:**
  - E-Visits: Not Allowable
  - Telephone: CPT 99441-99443
  - Virtual Check-In: Not Allowable

- **Effective Date:**
  - E-Visits & Virtual Check-Ins: Not Allowable
  - Telephone: Effective March 19th, 2020 until further notice

- **Modifier:**
  - None

- **Patient Type:** Established

**Telehealth:**

- **Allowable Codes:** Utilize the CPT/HCPCS code that would have used if the encounter were provided in person. MHCP has provided examples of telehealth services that include but are not limited to:
  - Consultations
  - Telehealth consults: emergency department or initial inpatient care
  - Subsequent hospital care services with the limitation of one telemedicine visit every 30 days per eligible provider
  - Subsequent nursing facility care services with the limitation of one telemedicine visit every 30 days
  - End-stage renal disease services
  - Individual and group medical nutrition therapy
  - Individual and group diabetes self-management training with a minimum of one hour of in-person instruction to be furnished in the initial year training period to ensure effective injection training
  - Smoking cessation
  - Alcohol and substance abuse (other than tobacco) structured assessment and intervention service
  - Effective March 19th, 2020, the commissioner has also temporarily expanded telemedicine (including telephone and video visits) to Rule 25 assessments, comprehensive assessments, and group therapy.

- **Documentation:** Each telehealth visit must include the following documentation:
  - The type of service provided
  - The time the service began and the time the service ended, including an a.m. and p.m. designation
  - A description of the provider’s basis for determining that telemedicine is an appropriate and effective means for delivering service to the recipient
  - The mode of transmission of the telemedicine service
  - The location of the originating and distant site
  - Compliance with the criteria attested to by the health care provider

- **HIPAA Compliant Platform:** Per the MCHP manual, telehealth must be conducted over a secure encrypted web site as specified by HIPAA (e.g. Skype). Seeking clarification to see if this requirement has been waived for the COVID-19 pandemic.

- **Frequency:** Effective March 19th, 2020 until further notice, MHCP has waived the current limitation of three telemedicine encounters per week.

- **Modifiers/POS:**
  - Professional (1500) Claims:
    - Providers with TD Specialty Code on their Provider File:
      - **Traditional Telehealth Services:** Utilize POS 02
      - **Services Normally Provided in Office:** For services that would have normally been provided in the office and are now provided by telephone or telehealth, utilize the POS that would have been used if the service was provided in person with modifier 95.
• **New Telemedicine Providers:** Utilize the POS that would have been used if the service were provided in person with modifier 95.
  ▪ The above is also applicable for providers who have submitted a Telemedicine Assurance Statement, but it has not yet been approved.
  ▪ **Facility (UB) Claims:** Append modifier 95

• **Patient Location:** Eligible Originating Sites: Office of physician or practitioner, Hospital (inpatient or outpatient), Critical access hospital (CAH), Rural health clinic (RHC) and Federally Qualified Health Center (FQHC), Hospital-based or CAH-based renal dialysis center (including satellites), Skilled nursing facility (SNF), End-stage renal disease (ESRD) facilities, Community mental health center, Dental clinic, Residential settings, such as a group home, assisted living, shelter or temporary lodging, Home (a licensed or certified health care provider may need to be present to facilitate the delivery of telemedicine services provided in a private home), School, Correctional facility-based office, Mobile stroke unit.

• **Patient Type:** Effective March 19th, 2020 through June 30th, 2021, MHCP has waived the requirement that a provider’s first visit with a patient be conducted face-to-face.

• **Provider Type:** Physician, Nurse Practitioner, Physician Assistant, Nurse Midwife, Clinical Nurse Specialist, Registered Dietitian or Nutrition Professional, Dentist, Dental Hygienist, Dental Therapist, Advanced Dental Therapist, Mental Health Professional (as qualified under Minnesota Statute 245.462 Subd. 18), Pharmacist, Certified Genetic Counselor, Podiatrist, Speech Therapist, Physical Therapist, Occupational Therapist, Audiologist, Public Health Nursing Organization.
  ▪ **Providers Temporarily Allowed to Provide Telehealth Services:**
    • A Licensed Healthcare Provider who is licensed under chapter 147, 147A, 148, 148B, 148E, 148F, 150A, or 153, a Mental Health Professional who is qualified under the requirements provided by Minnesota Statute 245.462, subdivision 17, 245.462, subdivision 178, or 245.4871, subdivision 26 who DID NOT already have a Telemedicine Assurance Statement on file with MHCP.
    • Community Health Worker, Public Health Nurse Clinic, Doula (pre and postnatal care only), Physician extenders, Licensed Alcohol and Drug Counselors, Alcohol and Drug Counselors, Alcohol and Drug Counselor – Temps Recovery, Peers and student interns in SUD programs licensed under chapter 245G, Pharmacists enrolled to perform medication therapy management.
    • All mental health professionals, mental health practitioners, mental health certified peer specialists, and mental health certified family peer specialists in the following behavioral health settings: Adult Day Treatment (ADT), Adult Rehabilitative Mental Health Services (ARMHS), Assertive Community Treatment (ACT), Children’s Residential Facilities (CRF), Children’s Therapeutic Services and Supports (CTSS) including Children’s Day Treatment, Crisis Response Services, Diagnostic Assessment, Dialectical Behavioral Therapy (DBT), First Episode Psychosis (FEP), Intensive Nonresidential Rehabilitative Mental Health Services (Youth ACT), Intensive Residential Treatment Services (IRTS), Intensive Treatment in Foster Care (ITFC), Mental Health Certified Family Peer Specialist Services, Mental Health Certified Peer Specialist Services, Mental health rehabilitation workers in ARMHS and mental health behavioral aides in CTSS, Outpatient Psychotherapy, Partial Hospitalization (PHP), Physician Consultation, Evaluation and Management, Psychiatric Consultation to Primary Care Providers, Psychiatric Residential Treatment Facilities (PRTF), Psychological Testing, Psychotherapy for Crisis, Residential Crisis Stabilization (RCS).
    • Psychiatric care providers in Assertive Community Treatment (ACT) and Intensive Rehabilitative Mental Health Services (IRMHS).
    • As of May 6th, 2021- out-of-state telehealth registration applications will no longer be processed.

• **Reimbursement:** Reimbursement will be at the same rate as in-person face-to-face visits, refer to the MN Medicaid fee schedule for allowable rates.

• **Transmission & Originating Site Fees:** MHCP will not reimburse for originating site facility fees (HCPCS Q3014) and does not specify whether transmission fees will be reimbursed.

**Telemedicine Assurance Statement:** Any provider who will be providing telehealth services must have a Telemedicine Assurance Statement on file with MHCP.
Providers who were already providing traditional telemedicine and have a Telemedicine Assurance Statement on file with MHCP, with an effective date before March 19th, 2020, do not need to submit anything additional and can submit claims for telehealth visits retroactively to March 19th, 2020.

Providers who DO NOT have a Telemedicine Assurance Statement on file with MHCP, and those who do not meet the standard requirements for telehealth or who do not plan to continue to provide telehealth after the COVID-19 PHE, will need to submit a Telephonic Telemedicine Provider Assurance Statement, available at the following link: https://edocs.dhs.state.mn.us/Ilserv/Public/DHS-6806A-ENG

- Per MHCP the following will apply to completing the Telephonic Telemedicine Provider Assurance Statement (DHS-6806A):
  - “Requested Service Effective Date” can be on or after March 19th, 2020. If provider has already submitted DHS-6806A and requested an effective date of April 1st, 2020, do not need to resubmit the DHS-6806A. Telehealth services can be provided back to March 19th, 2020
  - Organizational providers may submit one DHS-6806A signed by an authorized representative of the organization; along with a spreadsheet of all providers, including their NPI, affiliated with their practice that will be providing telemedicine. Processing telemedicine assurance statements is our top priority and the normal 30-day processing timeline should not apply. Providers can determine whether a provider is approved without having to wait for claim denials by logging in to their MN–ITS account and accessing the Telemedicine/Telephonic Telemedicine Provider List from the Provider Lists link. The list will be updated Mondays of each week and must be viewed using a Chrome or Firefox browser and the Excel XLSX version.
  - Providers who want to continue to provide telemedicine services after the peacetime emergency has ended must meet telemedicine standard requirements and submit a Provider Assurance Statement for Telemedicine (DHS-6806).

- Video Component: MHCP has expanded the definition of telemedicine to include telephone conversations so all providers who have a telemedicine agreement in place can provide telephone visits, as medically appropriate.

- Noncovered Telehealth Services:
  - Children’s day treatment
  - Partial hospitalization programs
  - Mental health residential treatment services
  - Case management services delivered to children
  - Prescription renewals
  - Scheduling a test or appointment
  - Clarification of issues from a previous visit
  - Reporting test results
  - Non-clinical communication
  - Communication via telephone, email or fax
  - Day treatment
  - Partial hospitalization programs
  - Residential treatment services
  - Case management face-to-face contact

- Targeted Case Management: Effective March 19th, 2020 to the end of the PHE, MHCP is allowing targeted case management services to be provided via telephone or audiovisual telehealth to adults receiving services or their legal guardians and to children receiving services and their parents or legal guardians. The affected programs include:
  - Child welfare targeted case management
  - Children’s mental health targeted case management
  - Adult mental health targeted case management
  - Vulnerable adult or adult with developmental disabilities (VA/DD) targeted case management
  - Relocation service coordination targeted case management
  - TCM providers do not need to meet the telemedicine standards and do not need to submit a Telephonic Telemedicine Provider Assurance Statement (DHS-6806A) during the COVID-19 pandemic.
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Cost Share Waiver:

- Effective January 1st, 2020 until further notice, MHCP will waive all cost sharing for services for the diagnosis and treatment of COVID-19.
  - **Uninsured COVID-19**: Effective May 1, 2020 until further notice, MHCP has instructed providers to bill DHS through MN-ITS on a fee-for-service basis for uninsured people eligible for MA coverage for COVID-19 testing and the office visit during which the test was given.

See Bulletin #20-69-02 for additional details regarding TCM: https://www.dhs.state.mn.us/main/idcplg?IdcService=GET_FILE&RevisionSelectionMethod=LatestReleased&Rendition=Primary&allowInterrupt=1&noSaveAs=1&dDocName=dhs-320407
Payor Specific Key Points
Effective June 15th, 2021

E-Visits/Telephone/Virtual Check Ins:

- Allowable Codes:
  - E-Visits: 98970-98972, 99421-99423
  - Telephone: Not allowed
  - Virtual Check-In: Check Provider Fee Schedule
  - E/M services are provided over an asynchronous and all the following conditions apply:
    - Services are provided by a health care professional who is licensed, registered, or otherwise authorized to engage in his or her health care profession as evidenced by the credentialing and licensing requirements of Sanford Health Plan
    - The extend of services provide via telemedicine modality includes at least a problem focused history and straight forward medical decision making as defined by the CPT manual
    - Services delivered via telemedicine modality should not be billed more than once within 7 days for the same episode of care or be related to an E/M performed within 7 days. E-visits billed within the post operative period of a major or minor service will be considered global.
  - Sanford allows E-Visits / Video Visits via internet initiated by patient or group homes. Check provider fee schedule for exact CPT codes
  - Modifier: None
  - Patient Type: Not specified

Telehealth:

- Allowable Codes: Telehealth is covered when conducted under an allowable originating site setting when ALL of following criteria is met:
  - Services are medically appropriate and necessary
  - E/M services provided over a synchronous (audio/visual connection) are covered when all the following conditions apply:
    - Patient is present at time of consultation
    - The consultation takes place via interactive audio and/or video
    - Permanent record of the telemedicine communications relevant to the ongoing medical care of the patient is maintained as part of the medical record
    - Services delivered through a telemedicine modality shall be provided by a health care professional who is licensed, registered, or otherwise authorized to engage in his or her health care profession in the state where the patient is located
    - Appropriate informed consent is obtained
  - Examples of telehealth services include but are not limited to: office or outpatient visits, consultations (office, Internet-based, outpatient, emergency room), follow-up inpatient consultations, subsequent hospital care services, subsequent nursing facility services, pharmacologic management, treatment services for mental health and/or substance use disorders, neurobehavioral status exam, end stage renal disease (ESRD) related services, individual and group medical nutrition therapy, individual and group health and behavior assessment and intervention, individual and group kidney disease education (KDE) services, individual and group diabetes self-management training, smoking cessation services, high-intensity behavioral counseling to prevent sexually transmitted infections, annual face-to-face intensive behavioral therapy for cardiovascular disease or face-to-face behavioral counseling for obesity

- Effective Date: June 15th, 2021-Permenant Policy
- HIPAA Compliant Platform: Telehealth visits can be performed via non-compliant, non-public facing, HIPAA platforms, such as FaceTime, Facebook Messenger, Skype, Google Hangouts and WhatsApp.
- Modifiers/POS:
  - Professional (1500) claims: POS 02 and modifier GT or 95
  - Facility (UB) claims: Modifier GT or 95

Non-Covered:
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- Acupuncture
- Benefits excluded from coverage based on the member’s policy
- Chiropractic care
- Deferrable elective care
- Dental care
- Medically inappropriate services or services that cannot be performed adequately via Telehealth for the medical condition

- **Originating Site:** The office of a physician or practitioner, hospitals (inpatient or outpatient), critical access hospitals (CAHs), rural health clinics (RHCs), federally qualified health centers (FQHCs), hospital- or CAH-based renal dialysis centers (including satellites), skilled nursing facilities (SNFs), ambulatory surgical centers (ASCs), laboratories, and community mental health centers (CMHCs). Additionally, Sanford Health Plan allows E-Visits / Video Visits via internet initiated by patient or group homes.
  - Sanford Health defines a “Video Visit” as: video interactions between a patient and provider, where the patient is at home or work on a web camera speaking with a provider. Seeking clarification if telehealth codes can be billed for these visits.
  - The originating site of the patient is determinative of whether the provider may continue care. If the originating site is a state where the provider is licensed, the call may continue. However, should it become known that the originating site is somewhere other than where the provider is licensed, the telehealth/telemedicine call must be terminated.

- **Provider Type:** Physician or surgeon, nurse practitioner, physician assistant, nurse-midwife, clinical nurse specialist, clinical psychologist, clinical social worker, registered dietician or nutrition professional.

- **Patient Type:** Established

- **Reimbursement:** Refer to your Sanford Health contract for allowable telehealth rates.

- **Transmission & Originating Site Fees:** Not allowable

- **Video Component:** Required

**Cost Share Waiver:**
Effective June 15th, 2021, Sanford Health returned to cover at cost-share based on member’s plan. Telehealth visits resulting in the evaluation or administration of a COVID test will not have a cost share per the Families First COVID Act.

**March 6th, 2021-June 15th, 2021**

**E-Visits/Telephone/Virtual Check Ins:**

- **Allowable Codes:**
  - **E-Visits:** 98970-98972, 99421-99423
  - **Telephone:** 99441-99443, 98966-98968
  - **Virtual Check-In:** Check Provider Fee Schedule

- **Effective Date:**
  - **E-Visits & Virtual Check-Ins:** N/A
  - **Telephone:** March 20th, 2020

- **Modifier:** None

- **Patient Type:** Established

**Telehealth:**

- **Allowable Codes:** Sanford Health will allow telehealth to be performed for the below medically appropriate services.
  - Audio-only visits
  - Behavioral health and substance use disorder treatment
  - Diabetes education
  - Nutrition counseling
  - Occupational therapy (OT) (plan evaluation and treatment)
  - Telehealth office visits
  - Physical therapy (PT) (plan evaluation and treatment)
Speech therapy (ST) (plan evaluation and treatment)

Telehealth services must maintain visual or audio contact between the provider and member, along with being medically appropriate and necessary with supporting documentation included in the patient’s medical record.

- **Effective Date:** March 20th, 2020-End of PHE
- **HIPAA Compliant Platform:** Telehealth visits can be performed via non-compliant, non-public facing, HIPAA platforms, such as FaceTime, Facebook Messenger, Skype, Google Hangouts and WhatsApp.
- **Modifiers/POS:**
  - Professional (1500) claims: POS 02 and modifier GT or 95
  - Facility (UB) claims: Modifier GT or 95
- **Non-Covered:**
  - Acupuncture
  - Benefits excluded from coverage based on the member’s policy
  - Chiropractic care
  - Deferrable elective care
  - Dental care
  - Medically inappropriate services or services that cannot be performed adequately via Telehealth for the medical condition
- **Provider Type:** Sanford Health will allow the lifting of license requirements for Telehealth providers in those states that have allowed for non-licensed providers in good standing to provider services. All other standard credentialing and billing practices still apply.
- **Reimbursement:** 100% of allowable rates on provider fee schedule. On an interim basis, Sanford will pay telephone codes 99441-99443 codes at the same rate as a 99212-99214.
- **Transmission & Originating Site Fees:** Seeking Clarification
- **Video Component:** Sanford health has directed providers to utilize telephone CPT codes if audio only services are provided.

**Cost Share Waiver:**
Effective March 20th, 2020-June 15th, 2021, Sanford Health will waive all cost sharing for telehealth visits, regardless of DX.
**Payor Specific Key Points:**

**Effective January 1st, 2021**

**E-Visits/Telephone/Virtual Check Ins:**

- **Allowable Codes:**
  - **E-Visits:** 99421-99423, 98970-98972
  - **Interprofessional Consultation:** 99446-99449, 99451, 99452
  - **Remote Patient Monitoring:** 99091, 99453, 99454, 99457-99458, 99473-99474
  - **Telephone:** Check Fee Schedule
  - **Virtual Check-In:** G2010, G2012, G2250-G2252

- **Effective Date:**
  - **E-Visits, Interprofessional Consultations, Remote Patient Monitoring, Virtual Check-Ins:** Permanently allowable per UHC Telehealth/Telemedicine Policy effective 01/01/2021
  - **Telephone:** N/A

- **Modifier/POS:** None

- **Patient Type:** CPT code specific

**Telehealth:**

- **Allowable Codes:** See Telehealth Allowable Codes table below for allowable code sets. UHC will also allow any code on CMS’ Covered Telehealth Services list during the national PHE.
  - **PT/OT/ST Services:** All PT/OT/ST Telehealth visits must be performed using live, interactive video conferencing that involves the presence of both parties at the same time and a communication link between them that allows a real-time audio and visual interaction to take place. E-mailing “stored” exercise videos and discussing or reviewing by phone is not reimbursable.

- **Effective Date:** UHC’s permanent Telehealth/Telemedicine Policy is effective 01/01/2021
  - **Out of Network:**
    - **COVID-19 Testing Related Visits:** March 18th, 2020-End of PHE

- **HIPAA Compliant Platform:** During the PHE, telehealth visits can be performed via non-compliant HIPAA platforms, such as FaceTime, Facebook Messenger, Skype, Google Hangouts and WhatsApp. After the PHE ends, visits must be performed over a HIPAA compliant platform.

- **Modifiers/POS:**
  - **Professional (1500) claims:** POS 02. Modifiers 95, GT, GQ, and G0 are not required to identify telehealth services but are accepted as information if reported on claims.
  - **Facility (UB) claims:** Revenue code 780 (allowable during the PHE only)

- **Provider Type:** Physician, nurse practitioner, physician assistant, nurse-midwife, clinical nurse specialist, registered dietitian or nutrition professional, clinical psychologist, clinical social worker, certified registered nurse anesthetists, physical therapists, occupational therapists, and speech therapists.

- **Reimbursement:** Reimbursement will be at the same rate as in-person face-to-face visits, refer to your UHC contract for allowable rates.

- **Originating Site:** UHC will recognize CMS designated originating sites considered eligible for furnishing telehealth services to a patient located in an originating site. Examples of CMS originating sites with a telpresenter: the office of a physician or practitioner, hospital, critical access hospital (CAH), rural health clinic (RHC), federally qualified health center (FQHC), hospital based renal dialysis center, skilled nursing facility (SNF), community mental health center (CMHC), mobile stroke unit, patient home-for monthly end stage renal, ESRD-related clinical assessments, for purposes of treatment of a substance use disorder or a co-occurring mental health disorder. UHC will also recognize home as an originating site for telehealth services (no telepresenter present)

- **Transmission & Originating Site Fees:** UHC will allow the originating site to submit a claim for services of the telepresenter using HCPS Q3014. T1014 is not eligible for payment, UHC considers these services as incidental to the charges associated with the E/M.

- **Video Component:** Telehealth services must be performed over an audiovisual connection.

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Cost Share Waiver:
  o COVID-19 Testing Related Telehealth:
    ▪ In & Out of Network: February 4th, 2020-End of PHE

### UHC ELEGIBLE TELEHEALTH CODES

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PT/OT/ST

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Effective March 18th, 2020-December 31st, 2020

E-Visits/Telephone/Virtual Check Ins:

- Allowable Codes:
  - E-Visits: 99421-99423, G2061-G2063
  - Telephone: 99441-99443, 98966-98968
  - Virtual Check-In: G2010, G2012

- Effective Date:
  - E-Visits: Previously Allowable
  - Virtual Check-In & Telephone:
    - In-Network:
      - In-Network: March 18th, 2020 through December 31st, 2020
    - Out of Network:
      - COVID-19 Visits:
        - Out-of-Network for COVID-19 Testing: March 18th, 2020-End of PHE
        - As of October 23rd, 2020, telehealth services will be covered according to the member’s benefit plan and UHC’s standard telehealth reimbursement policy.
      - Non-COVID-19 Visits:
- As of July 25th, 2020, telehealth services are covered according to the member's benefit plan and UHC’s standard telehealth reimbursement policy.

- **Modifier:** None

- **Patient Type:**
  - E-Visits: Established Only
  - Virtual Check-Ins & Telephone: New & Established

### Telehealth

- **Allowable Codes:** UHC will allow any code on the Medicare covered telehealth code list to be billed. Any code on UHC’s telehealth eligible code list can still also be used. See table below for allowable code set.

- **Effective Date:** UHC has waived the originating site requirement (allowing the patient to be at home) and has waived the telehealth video requirement with effective and term dates as listed below.
  - In-Network:
    - In-Network: March 18th, 2020 through December 31st, 2020
  - Out of Network:
    - COVID-19 Visits:
      - Out-of-Network for COVID-19 Testing: March 18th, 2020-End of PHE
        - As of October 23rd, 2020, telehealth services will be covered according to the member’s benefit plan and UHC’s standard telehealth reimbursement policy.
    - Non-COVID-19 Visits:
        - As of July 25th, 2020, telehealth services are covered according to the member’s benefit plan and UHC’s standard telehealth reimbursement policy.

- **HIPAA Compliant Platform:** Telehealth visits can be performed via non-compliant HIPAA platforms, such as FaceTime, Facebook Messenger, Skype, Google Hangouts and WhatsApp.

- **Modifiers/POS:**
  - Professional (1500) claims:
    - Commercial: Utilize modifier GT for CMS recognized CPTs, modifier 95 for AMA Appendix P CPTs, and modifier G0 for telehealth services for diagnosis, evaluation, or treatment, of an acute stroke with POS that would have been used if visit were furnished in person.
    - Medicare Advantage: Utilize modifier 95 and POS that would have been used if visit were furnished in person.
  - Facility (UB) claims: Utilize revenue code 780.

- **Provider Type:** UHC follows CMS’ policies on the types of care providers eligible to deliver telehealth services. These include physician, nurse practitioner, physician assistant, nurse-midwife, clinical nurse specialist, registered dietitian or nutrition professional, clinical psychologist, clinical social worker, certified registered nurse anesthetists. UHC will also allow physical therapists, occupational therapists, speech therapists, and chiropractic providers to provide limited services via telehealth.

- **Reimbursement:** Reimbursement will be at the same rate as in-person face-to-face visits, refer to your UHC contract for allowable rates.

- **Transmission & Originating Site Fees:** T1014 and Q3014 are not eligible for payment, UHC considers these services as incidental to the charges associated with the E/M.

- **Video Component:** The video component requirement for telehealth services has been waived, except in cases where UHC has specifically stated audiovisual is required, which includes PT/OT/ST, chiropractic therapy, home health, and hospice.
  - Medicare Advantage plans, including DSNP plans, still require an audiovisual connection, except for CMS indicated audio only codes.

### Cost Share Waiver

- **Commercial:**
  - Non COVID-19 Telehealth: March 31st, 2020 -September 30th, 2020, UHC waived member cost sharing for all in-network telehealth visits for medical, outpatient behavioral, PT/OT/ST, chiropractic therapy, home health and hospice, and remote patient monitoring services, regardless of DX.
Medicare Advantage:

- Non COVID-19 Telehealth:
  - March 31st, 2020 - September 30th, 2020, UHC waived member cost sharing for all in-network telehealth visits for medical, outpatient behavioral, PT/OT/ST, chiropractic therapy, home health and hospice, and remote patient monitoring services, regardless of DX.
  - October 1st, 2020 - December 31st, 2020, UHC will waive the cost share for in-network and covered out-of-network primary care telehealth services only.
    - Effective October 1st, 2020 UHC will adjudicate in accordance with the member’s benefit plan for non-primary care telehealth services.
- COVID-19 Testing Related Telehealth:
  - In & Out of Network: February 4th, 2020 - End of PHE
- COVID-19 Treatment Related Telehealth:
  - In Network: February 4th, 2020 - December 31st, 2020
  - Out of Network: February 4th, 2020 - October 22nd, 2020

**UHC ELEGIBLE TELEHEALTH CODES**

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<th>Codes Recognized with Modifier GT or GQ</th>
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<td>97112 97535 97750 97755 97760 97761</td>
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<tr>
<td>99395 99396 99397 H0031 H0032 H2012 H2014 H2019 H2021 H2027</td>
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Disclaimer: Although the data found here has been produced and processed from payor sources believed to be reliable, no warranty expressed or implied is made regarding accuracy, adequacy, completeness, legality, reliability, or usefulness of any information.
Below is a list of the current cost share waivers in place:

<table>
<thead>
<tr>
<th>Payor</th>
<th>Cost Sharing Guidelines</th>
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<tbody>
<tr>
<td>Aetna</td>
<td>Effective March 6th, 2021, through End of PHE: Aetna will waive cost sharing for COVID-19 testing-related services, which are medical visits that result in an order for or administration of a COVID-19 test; are related to furnishing or administering such a test or to the evaluation of an individual for purposes of determining the need for such a test</td>
</tr>
<tr>
<td>BCBS MN</td>
<td>Effective February 4th, 2020 until Further Notice, BCBS MN is waiving cost sharing for COVID-19 related visits, testing, treatment for their Medicare and Commercial lines.</td>
</tr>
<tr>
<td>Cigna</td>
<td>Effective March 13th, 2020 through January 15th, 2022: Cigna will waive member cost sharing for diagnostic testing and office visits/telehealth visits related to assessment and administration of diagnostic testing. Cigna will also waive member cost sharing for all virtual screening telephone consults (regardless of DX).</td>
</tr>
</tbody>
</table>
| Minnesota Medicaid | Effective January 1st, 2020 until further notice, MHCP will waive all cost sharing for services for the diagnosis and treatment of COVID-19.  
Uninsured COVID-19: Effective May 1, 2020 until further notice, MHCP has instructed providers to bill DHS through MN-ITS on fee-for-service basis for uninsured people eligible for MA coverage for COVID-19 testing and the office visit during which the test was given. |
| Medicare       | Effective March 18th, 2020-End of PHE: Medicare will waive cost sharing for COVID-19 testing-related services, which are medical visits that result in an order for or administration of a COVID-19 test; are related to furnishing or administering such a test or to the evaluation of an individual for purposes of determining the need for such a test; and are in a specified set of HCPCS E/M codes |
| Sanford Health | Effective June 15th, 2021-Sanford Health returned to cover at cost-share based on member’s plan. Telehealth visits resulting in the evaluation or administration of a COVID test will not have a cost share per the Families First COVID Act. |

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On March 27th, 2020, the Coronavirus Aid, Relief, and Economic Security (CARES) Act was signed into law. As part of the CARES Act, Congress has authorized RHCs to be a “distant site” for telehealth visits, therefore allowing RHC practitioners to provide telehealth services.

- **Allowable Telehealth Codes:** During the COVID-19 PHE, providers can provide any telehealth service that is approved as a Medicare telehealth service under the Medicare Professional Fee Schedule (PFS) (see the Medicare Allowable Telehealth Code Table in the Medicare section).

- **Billing:**
  - **Telehealth Services Provided January 27, 2020- June 30, 2020:** RHCs must report HCPCS code G2025 on their claims with the CG modifier. Modifier “95” may also be appended but is not required.
    - Claims will be paid at the RHC’s all-inclusive rate (AIR).
    - Claims will automatically reprocess in July when the Medicare claims processing system is updated with the new payment rate.
    - RHCs do not need to resubmit these claims for the payment adjustment.
  - **Telehealth Services Provided July 1, 2020 and Forward:** RHCs will no longer need to append the CG modifier on claims with HCPCS code G2025. Modifier “95” may be appended but is not required.
  - **COVID-19 Related Care:** Append modifier CS

<p>| RHC Claims for Telehealth Services from January 27, 2020 through June 30, 2020 |</p>
<table>
<thead>
<tr>
<th>Revenue Code</th>
<th>HCPCS Code</th>
<th>Modifiers</th>
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<tbody>
<tr>
<td>052X</td>
<td>G2025</td>
<td>CG (required) 95 (optional)</td>
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<p>| RHC Claims for Telehealth Services starting July 1, 2020 |</p>
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<thead>
<tr>
<th>Revenue Code</th>
<th>HCPCS Code</th>
<th>Modifiers</th>
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<tr>
<td>052X</td>
<td>G2025</td>
<td>95 (optional)</td>
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- **Cost Report:** Costs for furnishing distant site telehealth services will not be used to determine the RHC AIR rate but must be reported on the appropriate cost report form. RHCs must report both originating and distant site telehealth costs on Form CMS-222-17 on line 79 of the Worksheet A, in the section titled “Cost Other Than RHC Services.”

- **Cost Share Waiver:** Effective March 18th-the end of the COVID-19 PHE, Medicare is waiving cost sharing for specified categories of E/M services if they result in an order for or an administration of a COVID-19 test and relate to the furnishing or administration of such test or to the evaluation of an individual for purposes of determining the need for such test.
  - RHCs must waive collection of co-insurance from beneficiaries.
  - Apply CS modifier to the service item.
  - Claims with CS modifier will automatically reprocess July 1st, 2020.

- **Preventative Services:** If an RHC performs a preventive service via telehealth that is traditionally subject to a cost share waiver, then the RHC should apply a CS modifier to HCPCS G2025, even though the service is unrelated to COVID-19.

- **Mental Health Services:**
  - As of January 1st, 2022, CMS will continue to allow mental health telehealth services, performed by an RHC/FQHC even after the PHE ends
    - The service must be either audio visual OR
    - Audio-only, IF the following are present:
      - The patient is incapable of, or fails to consent to, the use of video technology for the service
The provider has conducted an in-person visit within the last 6 months of the initial tele-mental service
• The services are medical necessary
• After the initial telehealth visit, the provider conducts an in-person visit at least once every 12 months of each tele-mental visit.
  o However, if the patient and provider consider the risks of an in-person service and agree that these risks outweigh the benefits, then the annual visit may be skipped.
  o Providers must document the decision

**Reimbursement:** The RHC telehealth payment rate is set at $92.03 per visit, which is the average amount for all PFS telehealth services on the telehealth list, weighted by volume for those services reported under the PFS. This rate will apply to telehealth visits performed by independent or provider based RHCs.

**Telephone Services:** Effective March 1st, 2020 RHCs can perform audio only telephone E/M services utilizing CPT codes 99441, 99442, and 99443.
  - RHCs can furnish and bill for these services using HCPCS code G2025.
  - At least 5 minutes of telephone E/M by physician or other qualified health care professional who may report E/M services must be provided to an established patient, parent, or guardian.
  - Cannot be billed if they originate from a related E/M service provided within the previous 7 days or lead to an E/M service or procedure within the next 24 hours or soonest available appointment.
• **Virtual Check-Ins & E-Visits:** Medicare will allow RHCs to perform E-Visits (CPT codes 99421-99423), which are online digital E/M services that utilize a secure patient portal. Medicare will also allow RHCs to perform Virtual Check Ins (HCPCS G2012 and G2010).
  - RHCs should bill HCPCS G0071 if E-Visit or Virtual Check-In services are performed.
  - For claims submitted with G0071 on or after March 1, 2020, and for the duration of the COVID-19 PHE, payment for G0071 is set at the average of the national non-facility PFS payment rates for the 5 E-visits and Virtual Check-In codes, which is $24.76.
  - MACs will automatically reprocess any claims with G0071 for services furnished on or after March 1 that were paid at the CY 2020 rate of $13.53 before the claims processing system was updated.
  - G0071: Payment for communication technology-based services for 5 minutes or more of a virtual (non-face-to-face) communication between RHC or FQHC practitioner and RHC or FQHC patient, or 5 minutes or more of remote evaluation of recorded video and/or images by an RHC or FQHC.

**Visits/Telephone/Virtual Check Ins:**

**Allowable Codes:**
  - E-Visits: Not Allowable
  - Telephone: Seeking clarification for RHCs
  - Virtual Check-In: Not Allowable

**Effective Date:**
  - E-Visits & Virtual Check-Ins: Not Allowable
  - Telephone: Seeking clarification for RHCs

**Modifier:**
  - None

**Patient Type:** Seeking clarification

**Telehealth:**

**Allowable Codes:** Utilize the CPT/HCPCS code that would have used if the encounter were provided in person.

**RHC Billing:** All MHCP claims submission rules apply to the full MCO carve-out process, including prior authorization, benefit limits, copays and interpreter services. The exceptions for carve-out process exclusions

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include Medicare claims and behavioral and medical health care home claim procedure codes S0280 and S0281, as the MCOs will continue to pay these claims directly to the provider.

- Bill medical claims using the 837P (Professional) claim format
- For billing MHCP: Follow all frequency guidelines and request for authorization requirements
- For billing MCO's: Refer to MCO frequency guidelines and request for authorization requirements
- Enter time units according to the requirements for the services provided
- Report applicable modifiers, including telehealth modifiers as indicated below

- **Documentation:** Each telehealth visit must include the following documentation:
  - The type of service provided
  - The time the service began and the time the service ended, including an a.m. and p.m. designation
  - A description of the provider’s basis for determining that telemedicine is an appropriate and effective means for delivering service to the recipient
  - The mode of transmission of the telemedicine service
  - The location of the originating and distant site
  - Compliance with the criteria attested to by the health care provider

- **HIPAA Compliant Platform:** Per the MCHP manual, telehealth must be conducted over a secure encrypted web site as specified by HIPAA (e.g. Skype). Seeking clarification to see if this requirement has been waived for the COVID-19 pandemic.

- **Frequency:** Effective March 19th, 2020 until further notice, MHCP has waived the current limitation of three telemedicine encounters per week.

- **Modifiers/POS:**
  - **Professional (1500) Claims:**
    - **Providers with TD Specialty Code on their Provider File:**
      - **Traditional Telehealth Services:** Utilize POS 02
      - **Services Normally Provided in Office:** For services that would have normally been provided in the office and are now provided by telephone or telehealth, utilize the POS that would have been used if the service was provided in person with modifier 95.
    - **New Telemedicine Providers:** Utilize the POS that would have been used if the service were provided in person with modifier 95.
      - The above is also applicable for providers who have submitted a Telemedicine Assurance Statement, but it has not yet been approved.

- **Patient Location:** Eligible Originating Sites: Office of physician or practitioner, Hospital (inpatient or outpatient), Critical access hospital (CAH), Rural health clinic (RHC) and Federally Qualified Health Center (FQHC), Hospital-based or CAH-based renal dialysis center (including satellites), Skilled nursing facility (SNF), End-stage renal disease (ESRD) facilities, Community mental health center, Dental clinic, Residential settings, such as a group home, assisted living, shelter or temporary lodging, Home (a licensed or certified health care provider may need to be present to facilitate the delivery of telemedicine services provided in a private home), School, Correctional facility-based office, Mobile stroke unit.

- **Patient Type:** Effective March 19th, 2020 through June 30th, 2021, MHCP has waived the requirement that a provider’s first visit with a patient be conducted face-to-face.

- **Provider Type:** Individual providers within the enrolled RHC may include the following: chiropractor, clinical psychologist, clinical social worker, dentist, nurse practitioner, nurse midwife, physician, advanced dental therapist, dental therapists, physician assistant, and qualified mental health professionals.

- **Reimbursement:** Effective March 19th, 2020 RHC telemedicine services (including telephone) will be processed off the face-to-face encounter payment methodology. Any service when provided face-to-face, that would generate an encounter if performed in person, will continue to generate an encounter if provided via telemedicine, including telephone and audiovisual telehealth, as long as it meets all applicable telemedicine requirements.

- **Transmission & Originating Site Fees:** MHCP will not reimburse for originating site facility fees (HCPCS Q3014) and does not specify whether transmission fees will be reimbursed.

- **Telemedicine Assurance Statement:** Any provider who will be providing telehealth services must have a Telemedicine Assurance Statement on file with MHCP.
  - Providers who were already providing traditional telemedicine and have a Telemedicine Assurance Statement on file with MHCP, with an effective date before March 19th, 2020, do not need to submit anything additional and can submit claims for telehealth visits retroactively to March 19th, 2020.
Providers who DO NOT have a Telemedicine Assurance Statement on file with MHCP, and those who do not meet the standard requirements for telehealth or who do not plan to continue to provide telehealth after the COVID-19 PHE, will need to submit a Telephonic Telemedicine Provider Assurance Statement, available at the following link: https://edocs.dhs.state.mn.us/lfservlet/Public/DHS-6806A-ENG

- Per MHCP the following will apply to completing the Telephonic Telemedicine Provider Assurance Statement (DHS-6806A):
  - "Requested Service Effective Date" can be on or after March 19th, 2020. If provider has already submitted DHS-6806A and requested an effective date of April 1st, 2020, do not need to resubmit the DHS-6806A. Telehealth services can be provided back to March 19th, 2020. Organizational providers may submit one DHS-6806A signed by an authorized representative of the organization; along with a spreadsheet of all providers, including their NPI, affiliated with their practice that will be providing telemedicine. Processing telemedicine assurance statements is our top priority and the normal 30-day processing timeline should not apply. Providers can determine whether a provider is approved without having to wait for claim denials by logging in to their MN-ITS account and accessing the Telemedicine/Telephonic Telemedicine Provider List from the Provider Lists link. The list will be updated Mondays of each week and must be viewed using a Chrome or Firefox browser and the Excel XLSX version.
  - Providers who want to continue to provide telemedicine services after the peacetime emergency has ended must meet telemedicine standard requirements and submit a Provider Assurance Statement for Telemedicine (DHS-6806).

- **Video Component**: MHCP has expanded the definition of telemedicine to include telephone conversations so all providers who have a telemedicine agreement in place can provide telephone visits, as medically appropriate.

- **Noncovered Telehealth Services**:
  - Children’s day treatment
  - Partial hospitalization programs
  - Mental health residential treatment services
  - Case management services delivered to children
  - Prescription renewals
  - Scheduling a test or appointment
  - Clarification of issues from a previous visit
  - Reporting test results
  - Non-clinical communication
  - Communication via telephone, email or fax
  - Day treatment
  - Partial hospitalization programs
  - Residential treatment services
  - Case management face-to-face contact

- **Targeted Case Management**: Effective March 19th, 2020 to the end of the PHE, MHCP is allowing targeted case management services to be provided via telephone or audiovisual telehealth to adults receiving services or their legal guardians and to children receiving services and their parents or legal guardians. The affected programs include:
  - Child welfare targeted case management
  - Children’s mental health targeted case management
  - Adult mental health targeted case management
  - Vulnerable adult or adult with developmental disabilities (VA/DD) targeted case management
  - Relocation service coordination targeted case management

- TCM providers do not need to meet the telemedicine standards and do not need to submit a Telephonic Telemedicine Provider Assurance Statement (DHS-6806A) during the COVID-19 pandemic.

- See Bulletin #20-69-02 for additional details regarding TCM: https://www.dhs.state.mn.us/main/idcplg?IdcService=GET_FILE&RevisionSelectionMethod=LatestReleased&Rendition=Primary&allowInterrupt=1&noSaveAs=1&dDocName=dhs-320407
On March 27th, 2020, the Coronavirus Aid, Relief, and Economic Security (CARES) Act was signed into law. As part of the CARES Act, Congress has authorized FQHCs to act as a “distant site” for telehealth visits, therefore allowing FQHC practitioners to provide telehealth services.

- **Allowable Telehealth Codes**: During the COVID-19 PHE, FQHCs can furnish any telehealth service that is approved as a Medicare telehealth service under the PFS (see the Medicare Allowable Telehealth Code Table in the Medicare section).

- **Billing**:
  - **Telehealth Services Furnished January 27, 2020- June 30, 2020**: FQHCs should report 3 HCPCS/CPT codes: the FQHC Prospective Payment System (PPS) specific payment code (G0466, G0467, G0468, G0469, or G0470); the HCPCS/CPT code that describes the services furnished via telehealth with modifier 95; and G2025 with modifier 95.
    - Must be an FQHC qualifying visit.
    - These claims will be paid at the FQHC PPS rate until June 30th, 2020.
    - Claims will be automatically reprocessed beginning July 1st, 2020 at the $92.03 rate.
    - FQHCs do not need to resubmit these claims for payment adjustment.
  - **Telehealth Services Furnished for Non-Qualifying FQHC Visits**: FQHCs would need to hold these visits until July 1st, 2020 and then bill with HCPCS code G2025.
  - **Telehealth Services Furnished July 1, 2020 and Forward**: FQHCs will only need to submit HCPCS code G2025. Modifier “95” may be appended but is not required.

| FQHC Claims for Telehealth Services January 27, 2020 through June 30, 2020 |
|-----------------|-----------------|-----------------|
| Revenue Code    | HCPCS Code       | Modifiers       |
| 052X            | FQHC Specific Payment Code- G0466, G0467, G0468, G0469, G0470 | None |
| 052X            | FQHC PPS Qualifying Payment Code | 95 |
| 052X            | G2025 | 95 |

| FQHC Claims for Telehealth Services Starting July 1, 2020 |
|-----------------|-----------------|-----------------|
| Revenue Code    | HCPCS Code       | Modifiers       |
| 052X            | G2025 | 95 (optional) |

- **Cost Report**: Costs for furnishing distant site telehealth services will not be used to determine the FQHC PPS rate but must be reported on the appropriate cost report form. FQHCs must report both originating and distant site telehealth costs on Form CMS-224-14, the Federally Qualified Health Center Cost Report, on line 66 of the Worksheet A, in the section titled “Other FQHC Services”.

- **Cost Share Insurance Waiver**: Effective March 18th-the end of the COVID-19 PHE, Medicare is waiving cost sharing for specified categories of E/M services if the service results in an order for or an administration of a COVID-19 test and relate to the furnishing or administration of such test or to the evaluation of an individual for purposes of determining the need for such test.
  - FQHCs must waive collection of co-insurance from beneficiaries.
  - Apply CS modifier to the service item.
  - Claims with CS modifier will automatically reprocess July 1st, 2020.

- **Preventative Services**: If an FQHC performs a preventive service via telehealth that is traditionally subject to a cost share waiver, then the FQHC should apply a CS modifier to HCPCS G2025, even though the service is unrelated to COVID-19.
**Reimbursement:** The FQHC telehealth payment rate is set at $92.03 per visit, which is the average amount for all PFS telehealth services on the telehealth list, weighted by volume for those services reported under the PFS.

**Mental Health Services:**
- As of January 1st, 2022, CMS will continue to allow mental health telehealth services, performed by an RHC/FQHC even after the PHE ends
  - The service must be either audio visual OR
  - Audio-only, IF the following are present:
    - The patient is incapable of, or fails to consent to, the use of video technology for the service
    - The provider has conducted an in-person visit within the last 6 months of the initial tele-mental service
    - The services are medical necessary
    - After the initial telehealth visit, the provider conducts an in-person visit at least once every 12 months of each tele-mental visit.
      - However, if the patient and provider consider the risks of an in person service and agree that these risks outweigh the benefits, then the annual visit may be skipped.
      - Providers must document the decision

**Telephone Services:** Effective March 1st, 2020 FQHCs can perform audio only telephone E/M services utilizing CPT codes 99441, 99442, and 99443.
- FQHCS can furnish and bill for these services using HCPCS code G2025.
- At least 5 minutes of telephone E/M by physician or other qualified health care professional who may report E/M services must be provided to an established patient, parent, or guardian.
- Cannot be billed if they originate from a related E/M service provided within the previous 7 days or lead to an E/M service or procedure within the next 24 hours or soonest available appointment.

**Virtual Check-Ins & E-Visits:** Medicare will allow FQHCs to perform E-Visits (CPT codes 99421-99423), which are online digital E/M services that utilize a secure patient portal. Medicare will also allow FQHCs to perform Virtual Check Ins (HCPCS G2012 and G2010).
- FQHCs should bill HCPCS G0071 if E-Visit or Virtual Check-In services are performed.
- For claims submitted with G0071 on or after March 1, 2020, and for the duration of the COVID-19 PHE, payment for G0071 is set at the average of the national non-facility PFS payment rates for the 5 E-visits and Virtual Check-In codes, which is $24.76.
- MACs will automatically reprocess any claims with G0071 for services furnished on or after March 1 that were paid at the CY 2020 rate of $13.53 before the claims processing system was updated.
- G0071 Definition: Payment for communication technology-based services for 5 minutes or more of a virtual (non-face-to-face) communication between an RHC or FOHC practitioner and RHC or FQHC patient, or 5 minutes or more of remote evaluation of recorded video and/or images by an RHC or FQHC.

**MINNESOTA MEDICAID**

**Visits/Telephone/Virtual Check Ins:**

- **Allowable Codes:**
  - **E-Visits:** Not Allowable
  - **Telephone:** Seeking clarification for FQHCs
  - **Virtual Check-In:** Not Allowable

- **Effective Date:**
  - **E-Visits & Virtual Check-Ins:** Not Allowable
  - **Telephone:** Seeking clarification for FQHCs

- **Modifier:**
  - None
• Patient Type: Seeking clarification

Telehealth:

• Allowable Codes: Utilize the CPT/HCPCS code that would have used if the encounter were provided in person.

• FQHC Billing: All MHCP claims submission rules apply to the full MCO carve-out process, including prior authorization, benefit limits, copays and interpreter services. The exceptions for carve-out process exclusions include Medicare claims and behavioral and medical health care home claim procedure codes S0280 and S0281, as the MCOs will continue to pay these claims directly to the provider.
  o Bill medical claims using the 837P (Professional) claim format
  o For billing MHCP: Follow all frequency guidelines and request for authorization requirements
  o For billing MCO’s: Refer to MCO frequency guidelines and request for authorization requirements
  o Enter time units according to the requirements for the services provided
  o Report applicable modifiers, including telehealth modifiers as indicated below

• Documentation: Each telehealth visit must include the following documentation:
  o The type of service provided
  o The time the service began and the time the service ended, including an a.m. and p.m. designation
  o A description of the provider’s basis for determining that telemedicine is an appropriate and effective means for delivering service to the recipient
  o The mode of transmission of the telemedicine service
  o The location of the originating and distant site
  o Compliance with the criteria attested to by the health care provider

• HIPAA Compliant Platform: Per the MCHP manual, telehealth must be conducted over a secure encrypted web site as specified by HIPAA (e.g. Skype). Seeking clarification to see if this requirement has been waived for the COVID-19 pandemic.

• Frequency: Effective March 19th, 2020 until further notice, MHCP has waived the current limitation of three telemedicine encounters per week.

• Modifiers/POS:
  o Professional (1500) Claims:
    • Providers with TD Specialty Code on their Provider File:
      ▪ Traditional Telehealth Services: Utilize POS 02
      ▪ Services Normally Provided in Office: For services that would have normally been provided in the office and are now provided by telephone or telehealth, utilize the POS that would have been used if the service was provided in person with modifier 95.
    • New Telemedicine Providers: Utilize the POS that would have been used if the service were provided in person with modifier 95.
      ▪ The above is also applicable for providers who have submitted a Telemedicine Assurance Statement, but it has not yet been approved.

• Patient Location: Eligible Originating Sites: Office of physician or practitioner, Hospital (inpatient or outpatient), Critical access hospital (CAH), Rural health clinic (RHC) and Federally Qualified Health Center (FQHC), Hospital-based or CAH-based renal dialysis center (including satellites), Skilled nursing facility (SNF), End-stage renal disease (ESRD) facilities, Community mental health center, Dental clinic, Residential settings, such as a group home, assisted living, shelter or temporary lodging, Home (a licensed or certified health care provider may need to be present to facilitate the delivery of telemedicine services provided in a private home), School, Correctional facility-based office, Mobile stroke unit.

• Patient Type: Effective March 19th, 2020 through June 30th, 2021, MHCP has waived the requirement that a provider’s first visit with a patient be conducted face-to-face.

• Provider Type: Individual providers within the enrolled FQHC may include the following: chiropractor, clinical psychologist, clinical social worker, dentist, nurse practitioner, nurse midwife, physician, advanced dental therapist, dental therapists, physician assistant, and qualified mental health professionals.

• Reimbursement: Effective March 19th, 2020 FQHC telemedicine services (including telephone) will be processed off the face-to-face encounter payment methodology. Any service when provided face-to-face, that would generate an encounter if performed in person, will continue to generate an encounter if provided via telemedicine, including telephone and audiovisual telehealth, as long as it meets all applicable telemedicine requirements.

Disclaimer: Although the data found here has been produced and processed from payor sources believed to be reliable, no warranty expressed or implied is made regarding accuracy, adequacy, completeness, legality, reliability, or usefulness of any information.
Transmission & Originating Site Fees: MHCP will not reimburse for originating site facility fees (HCPCS Q3014) and does not specify whether transmission fees will be reimbursed.

Telemedicine Assurance Statement: Any provider who will be providing telehealth services must have a Telemedicine Assurance Statement on file with MHCP.
  - Providers who were already providing traditional telemedicine and have a Telemedicine Assurance Statement on file with MHCP, with an effective date before March 19th, 2020, do not need to submit anything additional and can submit claims for telehealth visits retroactively to March 19th, 2020.
  - Providers who DO NOT have a Telemedicine Assurance Statement on file with MHCP, and those who do not meet the standard requirements for telehealth or who do not plan to continue to provide telehealth after the COVID-19 PHE, will need to submit a Telephonic Telemedicine Provider Assurance Statement, available at the following link: https://edocs.dhs.state.mn.us/lfserver/Public/DHS-6806A-ENG

Per MHCP the following will apply to completing the Telephonic Telemedicine Provider Assurance Statement (DHS-6806A):
  - “Requested Service Effective Date” can be on or after March 19th, 2020. If provider has already submitted DHS-6806A and requested an effective date of April 1st, 2020, do not need to resubmit the DHS-6806A. Telehealth services can be provided back to March, 19th, 2020
  - Organizational providers may submit one DHS-6806A signed by an authorized representative of the organization; along with a spreadsheet of all providers, including their NPI, affiliated with their practice that will be providing telemedicine. Processing telemedicine assurance statements is our top priority and the normal 30-day processing timeline should not apply. Providers can determine whether a provider is approved without having to wait for claim denials by logging in to their MN–ITS account and accessing the Telemedicine/Telephonic Telemedicine Provider List from the Provider Lists link. The list will be updated Mondays of each week and must be viewed using a Chrome or Firefox browser and the Excel XLSX version.
  - Providers who want to continue to provide telemedicine services after the peacetime emergency has ended must meet telemedicine standard requirements and submit a Provider Assurance Statement for Telemedicine (DHS-6806).

Video Component: MHCP has expanded the definition of telemedicine to include telephone conversations so all providers who have a telemedicine agreement in place can provide telephone visits, as medically appropriate.

Noncovered Telehealth Services:
  - Children’s day treatment
  - Partial hospitalization programs
  - Mental health residential treatment services
  - Case management services delivered to children
  - Prescription renewals
  - Scheduling a test or appointment
  - Clarification of issues from a previous visit
  - Reporting test results
  - Non-clinical communication
  - Communication via telephone, email or fax
  - Day treatment
  - Partial hospitalization programs
  - Residential treatment services
  - Case management face-to-face contact

Targeted Case Management: Effective March 19th, 2020 to the end of the PHE, MHCP is allowing targeted case management services to be provided via telephone or audiovisual telehealth to adults receiving services or their legal guardians and to children receiving services and their parents or legal guardians. The affected programs include:
  - Child welfare targeted case management
  - Children’s mental health targeted case management
  - Adult mental health targeted case management
The following list is a summary of telehealth services that some payors are allowing – see payor’s allowable telehealth code list in the payor’s section.

- **Professional Fees** such as emergency department visits, initial and subsequent observation and observation discharge day management, initial and subsequent hospital care and hospital discharge day management, critical care services, initial and continuing intensive care services, etc.

- **Diabetes management training** (individual & group) and **individual medical nutritional** (initial and subsequent) are allowed by most payors. CMS, along with many other payors, considers Registered Dietitians and Nutritional Professionals as eligible telehealth clinicians.

- **Facility Fees**: If the patient is not coming into the hospital, you cannot bill your normal facility fee, except for Medicare.
  - Effective April 30th, 2020, Medicare is allowing hospitals to bill as the originating site for telehealth services furnished by hospital-based practitioners to Medicare patients registered as hospital outpatients, including when the patient is located at home.

**Commercial Billing:**

- **Professional (1500 Form)**: Utilize POS and modifiers as notated in each payor section.
- **Facility (UB Form)**: Utilize modifiers, revenue codes, and/or condition codes as notated in each payor section.

**Medicare Billing:**

- **Professional Services**:
  - **PPS Professional Fees (1500 Form)**: When a physician or nonphysician practitioner who typically furnishes professional services in a hospital outpatient department furnishes telehealth services during the COVID-19 PHE, including when the patient is at home, then bill with a hospital outpatient POS with modifier 95. The physician is paid under the physician fee schedule (PFS) at the facility rate.
  - **Method II CAH (UB Form)**: Utilize modifier GT when a physician performs services within the hospital outpatient department.

- **Facility (UB Form)**: CMS-5531-IFC specifically outlines appropriate billing for hospitals during the COVID-19 pandemic.
  - **CAHs**: The extraordinary circumstances policy in CMS-5531-IFC only applies to PPS hospitals and to services paid on OPPS. **It does not apply to CAHs.**
    - **CAH PT/OT/ST**: Append modifier 95 if therapy services are provided via telehealth.

- **PPS Hospitals**:
  - Hospital OP services reimbursed at the OPPS rate (i.e. diabetic management services, behavioral health, etc.), have the following choices:
    - Utilize the extraordinary circumstances policy, appending a PO modifier reimbursed at the OPPS rate.
    - **Not** utilize the extraordinary circumstances policy appending a PN modifier and DR condition code which is reimbursed a using the Physician Fee Schedule (PFS).
• **Medicare FAQ:**
  **Question:** When hospital clinical staff furnish a service using telecommunication technology to the patient who is a registered outpatient of the hospital and the hospital makes the patient’s home provider-based to the hospital as a temporary expansion site, should the hospital bill using the telehealth modifier (modifier 95)?
  **Answer:** No. In this situation the hospital is furnishing an outpatient hospital service, not a telehealth service, to a patient in a temporarily relocated department of the hospital as discussed at 85 FR 27560. Accordingly, the hospital would bill as it ordinarily would bill and would include the DR condition code or CR condition code (as applicable) on the claim. If the situation involves a relocation of an on-campus or excepted off-campus provider-based department to an off-campus hospital location, the hospital would bill using the PO modifier (service provided at an excepted off-campus provider-based department) only if the hospital requests an extraordinary circumstances relocation request within 120 days of the date the temporary expansion site is made provider-based to the hospital; otherwise, the hospital would append the PN modifier (service provided at a non-excepted off-campus location) to the UB claim.

For details on the requirements to utilize either option, including notification requirements to CMS, see the following link: [https://www.cms.gov/files/document/covid-19-faqs-508.pdf](https://www.cms.gov/files/document/covid-19-faqs-508.pdf)

• OP services already paid on the PFS (i.e. OT, PT, Speech), are billed on a UB with modifier 95 for services on the telehealth list. If the telehealth service performed is NOT on the telehealth list, the PN or PO modifier will apply.

• **Medicare FAQ:**
  **Question:** How do hospitals bill for outpatient therapy services furnished by employed or contracted therapists using telecommunications technology on the UB-04 claim form during the COVID-19 PHE?
  **Answer:** There are two options available to hospitals and their therapists.

1.) A hospital could choose to bill for services furnished by employed/contracted PTs, OTs, or SLPs through telehealth, meaning that they would identify furnished services on the telehealth list ([https://www.cms.gov/Medicare/Medicare-GeneralInformation/Telehealth/Telehealth-Codes](https://www.cms.gov/Medicare/Medicare-GeneralInformation/Telehealth/Telehealth-Codes)), they would bill these services on a UB-04 with a ‘-95’ modifier on each line for which the service was delivered via telehealth. No POS code is required (and there is no location for it on the UB-04).

2.) A hospital could, instead, use the flexibilities available under the Hospital Without Walls initiative. The hospital would register the patient as an outpatient, where the patient’s home acts as a provider-based department of the hospital. The hospital’s employed/contracted PT, OT, SLP would furnish the therapy care that the hospital believed could be furnished safely and effectively through telecommunications technology. The hospital is not limited to services included on the telehealth list (since these would not be considered telehealth services), but must ensure the care can be fully furnished remotely using telecommunications technology. The hospital would bill as if the therapy had been furnished in the hospital and the applicable PO/PN modifier would apply for the patient’s home since it would be serving as an off-campus department of the hospital. The option to bill for telehealth services, along with the -95 modifier, furnished by employed/contracted PTs, OTs, and SLPs using applicable audio-visual telecommunications technology applies to the following types of hospitals and institutions: Hospital – 12X or 13X (for hospital outpatient therapy services); Skilled Nursing Facility (SNF) – 22X or 23X (SNFs may, in some circumstances, furnish Part B PT/OT/SLP services to their own long-term residents); Critical Access Hospital (CAH) – 85X (CAHs may separately provide and bill for PT,OT, and SLP services on 85X bill type); Comprehensive Outpatient Rehabilitation Facility (CORF) – 75X (CORFs provide ambulatory outpatient PT, OT, SLP services); Outpatient Rehabilitation Facility (ORF) – 74X (ORFs, also known as rehabilitation agencies, provide ambulatory outpatient PT and SLP, as well as OT services); and Home Health Agency (HHA) – 34X (agencies may
• **Originating Site**: During the COVID-19 PHE, if the beneficiary’s home or temporary expansion site is considered to be a provider-based department of the hospital, and the beneficiary is registered as an outpatient of the hospital for purposes of receiving telehealth services billed by the physician or practitioner, the hospital may bill under the PFS for the originating site facility fee associated with the telehealth service.

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**PT/OT/ST**

Virtual visits for physical therapy, occupational therapy, and speech therapy have been a point of confusion for many hospitals and stand-alone therapists. The two main points of confusion are:

1.) If physical, occupational, and speech therapists are considered by the payor a provider qualified to perform telehealth services.
2.) If hospital-based physical, occupational, and speech therapists that bill for services on a UB-04 under the hospital NPI can perform virtual visits.

See the below matrix to determine what virtual visit codes therapists can bill. Telephone codes are not represented within the below matrix, as most payors have determined that PT/OT/ST services must be furnished via an audiovisual connection.

Note-Since most major payors allow for PT/OT/ST codes to be performed utilizing telehealth, our recommendation would be to utilize those codes where possible over the E-Visit codes due to reimbursement variances.

<table>
<thead>
<tr>
<th>Payor</th>
<th>Telehealth Codes</th>
<th>E-Visits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aetna</td>
<td>* Allowable PT/OT/ST code set is available in the “Aetna” section of this guide.</td>
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<tr>
<td></td>
<td>* PT/OT/STs are considered providers eligible to bill for telehealth services.</td>
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<tr>
<td></td>
<td>* 1500 Form: Utilize modifier GT or 95 and 02 POS. UB Form: Utilize GT or 95 modifier.</td>
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<td></td>
<td></td>
<td>1500 FORM-ALLOWABLE</td>
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<tr>
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<td></td>
<td>Individually enrolled therapists can bill CPT 98970 -98972 or G2061-G2063 for E-visits.</td>
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<tr>
<td></td>
<td></td>
<td>UB FORM-UNCLEAR</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No guidance for hospital-based therapists.</td>
</tr>
<tr>
<td>BCBS MN</td>
<td>* Allowable PT/OT/ST codes available in the “BCBS Minnesota” section of this guide.</td>
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<td></td>
<td>* PT/OT/STs are considered providers eligible to bill for telehealth services.</td>
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</tr>
<tr>
<td></td>
<td>* 1500 Form: Utilize modifier 95 and in person POS. UB Form: Modifier 95</td>
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<tr>
<td></td>
<td></td>
<td>NOT ALLOWABLE</td>
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<tr>
<td></td>
<td></td>
<td>E-Visit codes 98970-98972 are limited to PA, NP, and CNS practitioners. Therefore, PT/OT/STs are not eligible providers</td>
</tr>
<tr>
<td>Cigna</td>
<td>* PT/OT/STs can provide therapy services on their fee schedule, if appropriate to be provided via telehealth. PT/OT/STs are considered providers eligible to bill for telehealth services.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>* 1500 Form: Utilize modifier GT or 95 and in person POS. UB Form: Not Allowable as of January 1st, 2021</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>NOT ALLOWABLE</td>
</tr>
<tr>
<td>Medica</td>
<td>* Allowable PT/OT/ST code set is available in the “Medica” section of this guide.</td>
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<td></td>
<td>* PT/OT/STs are considered providers eligible to bill for telehealth services.</td>
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<tr>
<td></td>
<td>* 1500 Form: Utilize modifier GT or 95 and POS 02. UB Form: Utilize GT or 95 modifier.</td>
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<td>No guidance for hospital-based therapists.</td>
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<tr>
<td>Payor</td>
<td>ALLOWABLE</td>
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</tbody>
</table>
| **Minnesota Medicaid** | • Utilize CPT code that would have been used if visit was performed in person.  
• PT/OT/STs are considered eligible telehealth providers.  
• 1500 Form:  
  • Providers with TD Specialty Code on their Provider File:  
    • Traditional Telehealth Services: Utilize POS 02  
    • Services Normally Provided in Office: For services that would have normally been provided in the office and are now provided by telephone or telehealth, utilize the POS that would have been used if the service was provided in person and modifier 95.  
  • New Telemedicine Providers: Utilize the POS that would have been used if the service were provided in person and modifier 95.  
• UB Form: Utilize 95 modifier. | E-visit codes are not allowable for Minnesota Medicaid | Further Clarification w/ Plan Required |
| **Medicare** | • Allowable PT/OT/ST code set is available in the “Medicare” section of this guide.  
• PT/OT/STs are considered providers eligible to bill for telehealth services.  
• PT/OT/ST services can be furnished to a beneficiary in their home by a hospital-based therapist when the beneficiary is registered as an outpatient of the hospital and the hospital considers the beneficiary’s home to be a provider-based department of the hospital.  
• 1500 Form: Utilize POS for in person visit and 95 modifier.  
UB Form: Utilize 95 modifier. | 1500 FORM-ALLOWABLE  
Individually enrolled therapists can bill G2061-G2063 for E-visits. | UB FORM-UNCLEAR  
No guidance for hospital-based therapists, however these codes are marked with a non-payable status indicator in the OPPS fee schedule, therefore they are most likely not reimbursable on a UB. |
| **Sanford Health** | • Therapy providers are not considered allowable providers for telehealth | | CONDITIONAL  
Further Clarification w/ Plan Required |
| **UHC** | • Allowable PT/OT/ST code set is available in the “UHC” section of this guide.  
• 1500 Form: POS 02. UB Form: Modifier 95 and revenue code 780. | | 1500 FORM-ALLOWABLE  
Individually enrolled therapists can bill 98970-98972 for E-visits. |

### HIPAA COMPLIANT SOFTWARE

The Office of Civil Rights (OCR) has issued the below statement, and therefore Medicare and most other payors are allowing non-HIPAA compliant software to be used for virtual visits. However, some payors have still not waived this as requirement for payment. Refer to the HIPAA compliant statement within each payor section, or if the payor is not listed within this guide, reach out to the payor to verify their telehealth platform requirements.

Please note that public facing platforms are NOT allowed, such as Facebook Live, TikTok, Snapchat, etc.

The Office for Civil Rights (OCR) at the Department of Health and Human Services (HHS) is responsible for enforcing certain regulations issued under the Health Insurance Portability and Accountability Act of 1996 (HIPAA), as amended by the Health Information Technology for Economic and Clinical Health (HITECH) Act, to protect the privacy and security of protected health information, namely the HIPAA Privacy, Security and Breach Notification Rules (the HIPAA Rules).

During the COVID-19 national emergency, which also constitutes a nationwide public health emergency, covered health care providers subject to the HIPAA Rules may seek to communicate with patients, and provide telehealth services, through remote communications technologies. Some of these technologies, and the manner in which they are used by HIPAA covered health care providers, may not fully comply with the requirements of the HIPAA Rules.
REFERENCES & RESOURCES

Aetna:
https://navinet.navimedix.com/
https://www.aetna.com/individuals-families/member-rights-resources/covid19.html

BCBS of MN:
https://www.bluecrossmn.com/providers/education-center/coronavirus-information-providers

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

Cigna:

CMS:
https://www.cms.gov/index.php/Medicare/Medicare-General-Information/Telehealth/Telehealth-Codes

Medica:
https://www.medica.com/providers

Minnesota Medicaid:
https://www.medica.com/providers

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