



# COVID-19 Telemedicine Implementation ECHO

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# Tele- Terminology (Texas)

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Telemedicine: Diagnosis and treatment, only physicians, PAs, and APNs

Telehealth: All other licensed health professional services

Telemonitoring: collected patient data is provided to a health care provider (often a physician or physician lead team) with health care decisions made based on that data

Live: interactive audio/visual connection with the patient

Store and Forward: static information is given to the provider who provides services without simultaneous interaction with the patient

There is no national agreement on terms, though there are efforts in this area.

# Could I do this if it wasn't telemedicine?

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Licensing

Credentialing

Standard of  
care

Payment

# Licensing & Credentialing

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The care occurs where the patient is located.

A license is almost always required:

- Physician Compact
- Consulting Exceptions

Credentialing is also a consideration:

- Expedited processes for Joint Commission and CMS

Covid 19 Exceptions

<https://imlcc.org/>

<http://www.fsmb.org/advocacy/covid-19/>

<https://www.medicaid.gov/state-resource-center/disaster-response-toolkit/federal-disaster-resources/entry/54093>

Requirement	Covid19	Normal
<b>HIPAA</b>	“Enforcement discretion” but encourages warning & doesn’t approve all services	Written acknowledgment prior to initiating treatment & private connection (BAA)
<b>Consent</b>	Waived via TMB, but best practice would be documentation of oral consent	Written consent prior to initiating treatment
<b>Prescribing</b>	Waived via DEA & TMV	Must have prior in person visit to prescribe scheduled drugs (DEA) & for chronic pain (TMB)
<b>Technology: Medicare</b>	Location requirements are waived via HHS Secretary (not all)	Live video & audio, with strict geographic, patient location, and provider requirements.
<b>Medicaid &amp; Private Pay (TDI)</b>	Must pay same rate as in person for any allowed platform if a covered service	Must pay for video telemedicine if a covered service
<b>Private Pay (ERISA)</b>	Discretionary, but may cover things during this time	Discretionary

# Links

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

<https://www.hhs.gov/sites/default/files/february-2020-hipaa-and-novel-coronavirus.pdf>

TMB: <http://www.tmb.state.tx.us/page/coronavirus>

DEA: <https://deadiversion.usdoj.gov/coronavirus.html>

CMS: <https://edit.cms.gov/files/document/medicare-telehealth-frequently-asked-questions-faqs-31720.pdf>

TDI: <https://www.tdi.texas.gov/news/2020/coronavirus-updates.html>

HHSC: <https://hhs.texas.gov/services/health/coronavirus-covid-19/coronavirus-covid-19-provider-information>

# Telemedicine Billing In the Time of COVID-19

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# Agenda

- Diagnosis codes
- CPT codes
- Modifiers and place of service
- Leveling E&M services
- Documentation
- Submitting claims



# Diagnosis Codes

- New ICD-10 for COVID-19, effective April 1
- Guidance for respiratory related illnesses:
  - Pneumonia
  - Acute bronchitis
  - Lower respiratory infection
  - Respiratory infection, NOS
  - Acute respiratory distress syndrome
  - Exposure
  - Screening
  - Signs and symptoms
- Check payer policies



# CPT Codes

- Telehealth  
99201-99215
- Virtual check-in
  - G2010
  - G2012
- e-Visit  
99421-99423
- Telephone  
99441-99443



# Modifiers and Place of Service

- Modifiers
  - 95 – Synchronous rendered via real-time interactive audio and video
  - GT – Interactive audio and video
  - GQ – Asynchronous telecommunications
  - CR – Catastrophe/disaster related
  - CS-Cost-sharing
  
- Place of service
  - 02 – Telehealth
  - 11 – Office
  - 22 – Outpatient hospital



# Leveling E&M Services

- 2021 changes in place temporarily
- MDM or time
- History and physical exam temporarily removed
- Definition of MDM will remain the same in the interim



# Documentation

- Standards have not changed!
- Complete records guard against improper billing
- Support medical necessity



# Claims Submission

- TDI tolling claims submission
- Check your contracts
- Know your timely filing limits



# Thank You

Questions?

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Physicians Caring for Texans



*Questions?*