



Telephone and Video Visits: COVID-19 UPDATED

April 2, 2020

In response to the COVID-19 pandemic, it is imperative that providers practice “social distancing” whenever possible. However, patients must be able to continue to have access to necessary medical care. Accordingly, **Partnership HealthPlan of California (PHC) providers must take steps to allow PHC members to obtain health care via telehealth when medically appropriate to do so as provided below.**

Unless otherwise agreed to by PHC and a provider, effective March 6, 2020 PHC will reimburse providers at the same rate, whether a service is provided in-person or through telehealth, if the service is the same regardless of the modality of delivery, as determined by the provider’s description of the service on the claim.

The Medi-Cal benefits or services being provided by the provider must be clinically appropriate based upon evidence-based medicine and/or best practices to be delivered via telehealth, subject to oral or written consent by the PHC member.

Due to statewide public health “Stay at Home” order, DHCS, state regulators, and PHC are encouraging video visits when medically appropriate. Some circumstances that limit the ability to provide services face-to-face and warrant telehealth services include the patient being quarantined at home or under guidelines of “stay at home” orders. If the patient lives remotely and does not have access to the internet or if the internet does not support HIPAA compliance, etc., services provided telephonically are acceptable.

Telephonic or Video Visits: With the federal declaration of a state of emergency, FQHCs, rural health clinics, and Tribal 638 Clinics may count video visits and telephone visits to “established” patients the same as in-office visits, for prospective payment. Any clinician eligible to bill for office visits may conduct a telephone or video visit with a patient in lieu of an office visit by way of Zoom or any other HIPAA-compliant platform that supports provider to patient communication for patient care. Such visits must last at least 5 minutes, must be documented in the patient’s medical record and are subject to oral or written consent by the patient.

Required Codes for Medi-Cal Providers and FQHC’s, RHC’s and Tribal 638 Clinics

- Existing face-to-face codes apply when a Medi-Cal provider/clinician is billing PHC for video/telephonic visits. **Example codes for the PCP Setting: 99201 – 99204, 99212 – 99214**
- **CPT or HCPCS code(s) must also be billed using valid place of service and/or bill type codes:**
 - When billing for services on a CMS-1500 form (or its electronic equivalent), a valid **Place of Service** code must be billed.
 - When billing for services on a UB-04 form (or its electronic equivalent), a valid **Bill Type** code must be billed.
- **Use appropriate telehealth modifiers**
 - **Synchronous**, interactive audio and telecommunications systems: **Modifier 95**
 - **Asynchronous** store and forward telecommunications systems: **Modifier GQ**
- **PCP QIP** - Please note that telephone and video visits will count toward the Primary Care Provider Quality Improvement Program (PCP QIP) Per Member Per Year (PMPY) statistics, which is part of the

new gateway measure in 2020.

- **Additional Required Codes for Tribal 638 Clinics**
- **Use HCPCS code T1015** (medical, per visit), which would be paid at the Prospective Payment System (PPS) or All-Inclusive Rate (AIR), respectively.
- **Synchronous Telehealth:** Services provided through synchronous telehealth for an “established patient” are subject to the same program restrictions, limitations, and coverage that exist when the service is provided in-person. For purposes of FQHCs, RHCs, and Tribal 638 Clinics, “established patients” are defined as those who have been seen at the clinic within the last three years.
- For Medi-Cal covered benefits or services that may be provided via synchronous telehealth, FQHCs, RHCs, and Tribal 638 Clinics would bill using the applicable Revenue Code and HCPCS code.

Telehealth Exclusions

- Certain types of services cannot be appropriately delivered via telehealth. These include services that would otherwise require the in-person presence of the patient for any reason, such as services performed in an operating room or while the patient is under anesthesia, where direct visualization or instrumentation of bodily structures is required, or procedures that involve sampling of tissue or insertion/removal of medical devices. A provider must assess the appropriateness of the telehealth modality to the patient’s level of acuity at the time of the service. Example exclusions include:
 - Anesthesia: 00100-01999 and 99100-99157;
 - Surgery: 10021-69990;
 - Speech/Occupational/Physical Therapy: 96101 to 97546, and 97750 to 97799;
 - Wound care: 97597 to 97610;
 - Acupuncture, osteopathic manipulation, chiropractic manipulation: 97810 to 98943)
- **For virtual/telephonic visits that do not meet the requirements**, the billing entity should bill the corresponding virtual/telephonic visit CPT or HCPCS and will be reimbursed the Medi-Cal fee-for-service (FFS) rate on file for the applicable procedure code (i.e. G0071 for FQHC/RHC and G2012 for others including tribal health).

Resources:

DHCS APL on COVID-19 Telehealth

<https://www.dhcs.ca.gov/Documents/COVID-19/APL-20-004-Emergency-Guidance-1135-Waiver.pdf>

<https://www.dhcs.ca.gov/formsandpubs/Documents/MMCDAPLsandPolicyLetters/APL2019/APL19-009COVID-19.pdf>

Telehealth Other Virtual Telephonic Communications – Updated March 24, 2020

https://www.dhcs.ca.gov/Documents/COVID-19/Telehealth_Other_Virtual_Telephonic_Communications_V3.0.pdf

CMS COVID-19 FAQs for State Medicaid and CHIP Agencies

<https://www.medicare.gov/state-resource-center/downloads/covid-19-faqs.pdf>

PHC Telehealth Services MCUP3113:

<http://www.partnershiphp.org/Providers/Policies/Documents/Utilization%20Management/MCUP3113.docx>

Department of Health Care Services COVID-19 Medi-Cal Services and Telehealth Notice: http://files.medi-cal.ca.gov/pubsdoco/newsroom/newsroom_30375.asp

Zoom Information - Sign up for a free Zoom account at <https://zoom.us/signup>. If you have any questions about Zoom, you can email info@zoom.us or call **1-888-799-9666**. Or visit online at <https://zoom.us/healthcare>

For additional guidance on Telehealth applications please visit the Health and Human Services webpage at <https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html>