

# SWH NY COVID-19 Telehealth Provider Q&A

Question	Answer
What is telehealth?	<p><b>The traditional CMS definition of telehealth is:</b></p> <p>“...the transmission of a patient's medical information from an originating site to the physician or practitioner at the distant site. The physician or practitioner at the distant site can review the medical case without the patient being present. An asynchronous telecommunications system in single media format does not include telephone calls, images transmitted via facsimile machines and text messages without visualization of the patient.</p> <p>For more information, visit 42 CFR 410.78 at: <a href="https://www.law.cornell.edu/cfr/text/42/410.78">https://www.law.cornell.edu/cfr/text/42/410.78</a>.</p> <p><b>The traditional Federal Medicaid definition of telemedicine is:</b></p> <p>“permitting two-way, real time interactive communication between the patient, and the physician or practitioner at the distant site. This electronic communication means the use of interactive telecommunications equipment that includes, at a minimum, audio and video equipment.</p> <p>Telemedicine is viewed as a cost-effective alternative to the more traditional face-to-face way of providing medical care (e.g., face-to-face consultations or examinations between provider and patient) that states can choose to cover under Medicaid. This definition is modeled on Medicare's definition of telehealth services (42 CFR 410.78). Note that the federal Medicaid statute does not recognize telemedicine as a distinct service.”</p> <p>For more information, visit: <a href="https://www.medicaid.gov/medicaid/benefits/telemedicine/index.html">https://www.medicaid.gov/medicaid/benefits/telemedicine/index.html</a>.</p>
What has changed for telehealth?	<p>During the state of emergency for COVID-19, electronic information and communication technologies include telephonic or video modalities (including technology commonly available on smart phones and other devices) when medically appropriate to deliver health care services for the assessment, diagnosis, consultation, treatment, care management and self-management of a patient and if all other requirements for a covered health care service are met.</p> <p>For more information, visit:</p> <ul style="list-style-type: none"><li>• DFS <a href="#">Circular Letter</a> on telehealth coverage</li><li>• DFS <a href="#">Q&amp;A</a> on telehealth coverage</li></ul>

	<ul style="list-style-type: none"> <li>DOH Comprehensive Telehealth <a href="#">guidance</a> for Medicaid providers</li> <li>Teleconference waiver <a href="#">update I</a> (issued March 13, 2020)</li> <li>Teleconference waiver <a href="#">update II</a> (issued March 18, 2020)</li> </ul>
Where can I find updated provider communications regarding COVID-19?	Visit the provider section of our website at <a href="http://www.seniorwholehealth.com">www.seniorwholehealth.com</a> .
When do the special telehealth exceptions and measures outlined in this document take effect and how long will they remain in effect?	They became effective March 15, 2020, and we plan to keep them in place while the federal emergency is in effect or until state guidance changes. We will share any updates via email blast and our website.
<p>Can I conduct outpatient sessions with SWH members <b>virtually/via computer using a HIPAA-compliant platform?</b></p> <p>How should I bill this?</p>	<p>Yes, we encourage you to use telehealth and strongly suggest that you use a HIPAA-compliant telehealth platform (real-time, interactive audio and video). However, considering the COVID-19 crisis and member access issues, you may have to utilize other methods such as FaceTime or Skype in order to ensure the member gets the help they need (see question directly below for guidance on NON-HIPAA-compliant methods).</p> <p><b>Medicare coverage:</b></p> <ul style="list-style-type: none"> <li>CMS will pay clinicians to provide telehealth services for Medicare beneficiaries across the country.</li> <li>Telehealth services for common office visits, mental health counseling, and preventive health screenings will be covered.</li> <li>Telehealth services can be conducted from the beneficiaries' home.</li> <li>Telehealth methods include phone, video chat, and online patient portals.</li> <li>Doctors, nurse practitioners, clinical psychologists and licensed clinical social workers will be able to offer telehealth to Medicare beneficiaries.</li> </ul>
<p>Can I conduct outpatient sessions with SWH members via <b>telephone or a non-HIPAA-compliant method (e.g., Skype or FaceTime)?</b></p> <p>How should I bill this?</p>	<p>We strongly suggest that you use a HIPAA-compliant telehealth platform, which includes both audio and video. (See below for further instruction on telehealth platforms.) However, if this is impossible due to the COVID-19 crisis, you may use telephone or a non-public method such as Skype or FaceTime for sessions.</p> <p>Note: Public-facing sites such as Facebook Live, TikTok, Twitch, YouTube, etc., should <b>NEVER</b> be used for telehealth.</p> <p><b>Medicare coverage:</b></p> <ul style="list-style-type: none"> <li>CMS will pay clinicians to provide telehealth services for Medicare beneficiaries across the country.</li> <li>Telehealth services for common office visits, mental health counseling, and preventive health screenings will be covered.</li> </ul>

	<ul style="list-style-type: none"> <li>• Telehealth services can be conducted from the beneficiaries' home.</li> <li>• Telehealth methods include phone, video chat, and online patient portals.</li> <li>• Doctors, nurse practitioners, clinical psychologists and licensed clinical social workers will be able to offer telehealth to Medicare beneficiaries.</li> </ul>
Can I conduct outpatient sessions with SWH NY members via text?	No, sessions via text message are not permissible.
Will you support outpatient sessions via telephone under all plans/products?	Yes, during this crisis, we are waiving our normal protocols to allow providers to provide and bill sessions by telephone.
Do I need an addendum in place to bill telephone sessions?	No, a contract addendum is not necessary to bill during this COVID-19 crisis.
Are there specific telephonic codes I should use?	Bill the appropriate covered CPT code (listed on your reimbursement schedule) using the GQ modifier and place of service 02.
I'm sick and/or quarantined and can't see patients at all. What should I do to ensure my patients get the care they need?	If you are unavailable and don't have coverage for your SWH patients who need care, you should coordinate care with SWH by calling provider services.
Can I conduct medication management/prescribing via telehealth or telephone?	<p>If you are an MD contracted to provide these services, yes you may.</p> <p>If you provide the service using a HIPAA-compliant telehealth platform, bill using the GT or 95 modifier and place of service 02.</p> <p>If you use a NON-HIPAA-compliant platform due to the crisis situation or member access issues, bill using the GQ modifier and place of service 02.</p> <p>Note: Public-facing sites such as Facebook Live, TikTok, Twitch, YouTube, etc., should <b>NEVER</b> be used for telehealth.</p>
How do I become a telehealth provider?	During this crisis, you can begin to deliver telehealth services immediately. We encourage you to use a HIPAA-compliant telehealth platform. Bill with the GT or 95 modifier and place of service 02. Visit <a href="http://www.seniorwholehealth.com">www.seniorwholehealth.com</a> for more information.
Can I use Skype or FaceTime for telehealth sessions?	We highly suggest using a telehealth platform that is HIPAA-compliant, however during this crisis we want members to receive the help they need, so you may use these methods – only on a temporary basis – to ensure patient needs are met. Bill using the GQ modifier and place of service 02.

	Note: Public-facing sites such as Facebook Live, TikTok, Twitch, YouTube, etc., should <b>NEVER</b> be used for telehealth.
Are there any changes to the telehealth codes or extension of codes?	No (with the exception of temporarily permitting telehealth for special services, see the facility section below). For telehealth billing information visit <a href="http://www.swhnyproviders.com">www.swhnyproviders.com</a> .
During this crisis, do I still need to obtain preauthorization for services (inpatient or outpatient) that normally require it?	Prior authorization for SNF and inpatient services are waived. However, we do ask the SNF to call us and report the admission.
Do all existing documentation, licensing and requirements to provide services remain in effect?	Yes.
During this crisis, are you relaxing your site visit requirements or timelines for recredentialing?	We are following State and National Accreditation standards as it relates to extensions on recredentialing. If you are due for recredentialing soon, please contact your provider contact for further details.
During this crisis, will you broaden the provider types who can submit certain services?	No, providers must continue to practice within their scope of services.
Whom can I contact for more information or specific questions about my concerns or patients' needs?	Please visit the provider section of our website at <a href="http://www.swhnyproviders.com">www.swhnyproviders.com</a> or call provider services at 1-877-353-9819.
How do you intend to update providers on your approach to COVID-19?	We will post information on the provider section of our website at <a href="http://www.swhnyproviders.com">www.swhnyproviders.com</a> .  We also may send periodic updates via email or fax. Please ensure your contact information is up to date by logging into the <a href="#">Provider Portal</a> and confirming/updating all information.

## Facility-specific Q&As

Question	Answer
Can I provide attending physician services to members in inpatient settings via telehealth or telephone?	<p>Yes, during this crisis we will allow provision and billing of attending physician services via telehealth, <b>but not over the phone</b>. If you provide the service using a HIPAA-compliant telehealth platform, bill using the GT or 95 modifier and place of service 02.</p> <p>If you use a NON-HIPAA-compliant platform due to the crisis situation or member access issues, bill using the GQ modifier and place of service 02.</p> <p>Note: Public-facing sites such as Facebook Live, TikTok, Twitch, YouTube, etc., should <b>NEVER</b> be used for telehealth.</p>
Can I provide IOP or PHP via telehealth?	<p>Yes, during this crisis you may, if you are delivering the <b>same service</b> via a telehealth platform – i.e., the same frequency and intensity of service, using the same IOP and PHP codes. If you provide the service using a HIPAA-compliant telehealth platform, bill using the GT or 95 modifier and place of service 02.</p> <p>If you use a NON-HIPAA-compliant platform due to the crisis situation or member access issues, bill using the GQ modifier and on the CMS-1500 also use place of service 02.</p> <p>Note: Public-facing sites such as Facebook, TikTok, Twitch, YouTube, etc., should <b>NEVER</b> be used for telehealth.</p> <p>HOWEVER, if you aren't delivering IOP or PHP, and you are not contracted as an outpatient provider but the member requires outpatient care, contact provider services at 1-877-353-9819 so we can refer them to an outpatient provider.</p> <p>If you are contracted for outpatient care, you may bill the outpatient service using the GT or 95 modifier and place of service 02 (HIPAA-compliant platform). If you use a NON-HIPAA-compliant platform due to the crisis situation or member access issues, bill using the GQ modifier and place of service 02.</p> <p>Note: Public-facing sites such as Facebook Live, TikTok, Twitch, YouTube, etc., should <b>NEVER</b> be used for telehealth.</p>
Can I bill for services performed by telephone, related to IOP or PHP?	No, IOP and PHP services are not permitted via telephone. However, member check-in and counseling by telephone is permitted, but should be billed with the outpatient visit code, along with using the GQ modifier and place of service 02.

# Additional Information:

**Notification of Enforcement Discretion for Telehealth Remote Communications During the COVID-19 Nationwide Public Health Emergency:**

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

**Centers for Medicare and Medicaid Services:**

CMS Guidance for Clinicians:

<https://www.cms.gov/About-CMS/Agency-Information/Emergency/EPRO/Current-Emergencies/Current-Emergencies-page>

CMS Provider factsheet for Telehealth:

<https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet>

Telehealth Toolkit for General Practitioners: <https://www.cms.gov/files/document/general-telemedicine-toolkit.pdf>

End-Stage Renal Disease Providers Toolkit Here: <https://www.cms.gov/files/document/esrd-provider-telehealth-telemedicine-toolkit.pdf>

## State specific guidance and information

New York State Department of Health Information for Healthcare Providers:

<https://coronavirus.health.ny.gov/information-healthcare-providers>

New York State Department of Financial Services Industry Guidance

<https://www.dfs.ny.gov/industry/coronavirus>