COVID-19 Virtual Visit & Reimbursement Guide
Colorado

Brought to you by:

Partnered with:

ruralMED
REVENUE CYCLE RESOURCES
Virtual Visit Types

- Telehealth
- Evisit
- Virtual Check Ins
- Telephone

Payor Matrix

Payor Guidelines

- Aetna
- Anthem BCBS
- Cigna
- Medica
- Medicare
- Colorado Medicaid
- United Healthcare

Cost Sharing Waivers

Telehealth Guidelines By Facility Type

- Rural Health Clinics/FQHC
- Hospital Outpatient
- Physical Occupational Speech Therapy

HIPAA Compliant Software

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

Remote Patient Monitoring:

Allowable Codes: 99453, 99454, 99457, 99458

Telehealth:

Allowable Services: 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.

HIPAA Compliant Platform: Through the end of the federal COVID-19 PHE, 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, 95, or FR
    - If audio only, POS 02 with modifier FQ or 93
  - UB: Modifier GT, 95, or FR
    - If audio only, modifier FQ or 93

Not Reimbursable:
- Synchronous telemedicine rendered via an audio only connection.
  - Modifier FQ or 93*
    *Allowable during the COVID-19 PHE
- Asynchronous Telemedicine Services (services reported w/ GQ modifier).
- Services that do not include direct patient contact, such as physician standby services.

Provider Location: 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: T1014 and Q3014 are not eligible for payment, Aetna considers these services as incidental to the charges associated with the E/M.

Video Component: The telehealth video component is required, except on codes indicated below that can be provided over audio only during the COVID-19 PHE.

Cost Share Waiver: 
• **Effective March 6th, 2020 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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**Telehealth Allowable Codes**

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**Commercial Codes Effective March 6th, 2020—Until Further Notice Due to COVID-19 Pandemic**

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**Codes in Blue Require an Audiovisual Connection**

**Codes in Green Can be Performed Over a Telephone or Audiovisual Connection**

**Cells Highlighted in Yellow do NOT Require Modifier GT, 95, or FR**

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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.
**Payor Specific Key Points**

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

**Allowable Codes:**
- **E-Visits:** Check fee schedule
- **Telephone:** 99441-99443, 98966-98968
- **Virtual Check-In:** Check fee schedule

### Telehealth:

**Allowable Services:** See below table for allowable telehealth codes

- **Not Covered:**
  - Non-direct member services other than Remote Patient Monitoring
  - Services that require equipment and/or direct physical hands-on care that cannot be provided remotely
    - PT/OT codes that require equipment and/or direct physical hands-on interaction and therefore are not appropriate via telehealth include: 97010-97028, 97032-97039, 97113-97124, 97139-97150, 97533, and 97537-97546.
  - Services rendered virtually that are not eligible for reimbursement when rendered in-person
  - Services rendered by facsimile, e-mail, instant messaging, electronic chart, or other electronic communication
  - Services that do not represent real-time interaction between a member located at the originating site and a provider located at a distant site.
  - PT/OT/ST services provided without live audio/visual communication

### HIPAA Compliant Platform:

- **Required**

### Modifiers/POS:

- **Professional (1500) Claims:** POS 02 or 10 with modifier 95 or GT
- **Facility (UB) Claims:**
  - Rendered At Distant Site: Appropriate revenue code for the service rendered with modifier 95 or GT
  - Rendered at Originating Site: POS for provider rendering in-person services to the member and originating site HCPCS
- **COVID-19 Related:** Append the CS modifier to line items in which COVID-19 evaluation or testing services were performed.

### Patient Location:

- Patient can be located at home or at an allowable originating site facility.

### Provider Type:

- Licensed providers performing services within their scope.
  - Providers do not need to notify Anthem of a temporary address for providing health care services. Providers should continue to submit claims with their primary service address, not their temporary address.

### Reimbursement:

- POS 02 and 10 will be eligible for office-based reimbursement.

### Transmission & Originating Site Fees:

- Originating site fee (Q3014) is allowable for originating site facilities.
- Transmission fees are not allowed

### Video Component:

- The video component has not been waived for telehealth codes, per Anthem if a telephonic-only visit is performed providers should utilize the telephone codes, CPT 99441-99443 and 98966-98968.

### Cost Share Waiver:

- Effective March 18th, 2020 through End of PHE: Anthem will waive 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.
• Effective March 19th, 2020-October 13th, 2022: Anthem will waive cost sharing for telephonic-only in-network visits.

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<td>Standard Telehealth List</td>
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Payor Specific Key Points

E-Visits/Telephone/Virtual Check Ins:

Allowable Codes:
- **E-Visits**: Not Allowable
- **Telephone**: 99441-99443
- **Virtual Check-Ins**: G2010, G2012

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
- **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.

Remote Patient Monitoring:

Cigna recognizes remote patient monitoring, which is the use of digital technologies to monitor and capture medical data from patients and electronically transmit this information to healthcare providers for assessment:

- **Allowable codes**: 99091, 99453, 99454, 99457, 99458, 99473, 99474, S9110

Telehealth:

**Allowable Services**: See below table for allowable telehealth codes.

All of the following must also be met:
- 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.
- Would be reimbursable if the service were provided face-to-face.
- The patient and/or actively involved caregiver must be present and the service must occur in real time.
- A permanent record of online communications is maintained as part of the patient's medical record as if the service were provided as an in-office visit.
  - Must include documentation which identifies the virtual service delivery method. I.e.: audio/video or telephone only.
- Medically appropriate and necessary
- Provided by a health care professional who is licensed, registered, or otherwise acting within the scope of his/her licensure.

**Excluded Services**:
- Service on the same day as a face-to-face visit, when performed by the same provider and for the same condition.
- Services billed within a post-operative period
- Services performed via asynchronous communications systems (e.g., fax).
- Store and forward telecommunication
- Communications 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*
  *Cigna will reimburse urgent care centers for virtual care services provided on and before March 12, 2022.
• Specific Excluded CPT Codes: 98966, 98967, 98968, 98970, 98871, 98972, 99421, 99422, 99423, G0406, G0407, G0408, G0409, G0425, G0426, G0427, G0459, G0508, G0509, G2025, S0320.

HIPAA Compliant Platform: Through the end of the PHE providers may use nonpublic facing, non-HIPAA compliant platforms, such as FaceTime, Skype, Zoom, etc).

Modifiers/POS:
• Professional/1500 Claims:
  o During the COVID PHE: POS for in person visit and modifier 95, GT, or GQ
  o Expiration of COVID PHE: POS 02 and modifier 95, GT, or GQ
  o Do not bill POS 10 or other virtual care modifiers until further notice
• Facility/UB Claims: Modifier 95
  o During the COVID-19 PHE, Cigna will temporarily reimburse virtual care services billed on a UB until further notice, when the service is:
    ▪ Reasonable to be provided in a virtual setting; reimbursable per a provider's contract; and
    ▪ Synchronous audiovisual technology is utilized (except for CPTs 99441-99443)
  o Note: Intensive outpatient program (IOP) telehealth services were covered prior to the pandemic, and will continue to be covered

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/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-End of PHE: Cigna 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 or to the evaluation of an individual for purposes of determining the need for such a test.
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

E-Visit Exclusions:
- See below “Telehealth Coverage Limitations”

Telehealth:

Allowable Codes: See table below for specific codes.
- Wellness Visits: During the COVID-19 PHE Medica will allow preventive visits to be provided via telehealth utilizing CPTs 99381-99387 and 99391-99397.
  o Providers may perform all or portions of a preventive visit that can be done appropriately via telehealth.
  o Services that require face-to-face interaction may be provided later, however, providers may only bill one preventive medicine code to cover both portions.

HIPAA Compliant Platform: Through the end of the federal COVID-19 PHE, non-HIPAA compliant, non-public facing software can be utilized for telehealth visits, such as Skype & FaceTime.

Modifiers/POS:
- Professional (1500) Claims: POS 02 or 10 with modifier GT or 95
- Facility (UB) Claims: GT or 95
- Audio Only: 93 or FQ
- COVID-19 Related: For services relating to the order for or administration of a COVID-19 test or for services related to the evaluation for purposes of determining the need for diagnostic testing, append modifier CS.


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). Utilize modifier GQ.

Originating Sites:
- 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, educational materials, brief follow-up of a medical procedure 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 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.

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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*

Cost Share Waiver:

Effective March 1st, 2020, through End of PHE: 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.
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

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

New patients allowable for COVID-19 PHE

Telehealth:
Allowable Codes: See table below for 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.

HIPAA Compliant Platform: Through the end of the COVID-19 PHE, 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.

Modifiers/POS:
- **Professional (1500) Claims**: POS that would have been used if the visit were provided in person with modifier 95.
- **Mental Health Claims: After PHE Ends**: POS 02 or 10 and modifiers FQ and FR
  - MACs have instructed providers not to use modifier FQ and FR during the PHE
- **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**: 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: Through the end of the PHE, telehealth services can be provided to both new and established patients.

Patient Location: During the COVID-19 PHE, 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.

- **Mental Health**: CMS permanently 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
  - 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
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.

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.
  - 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 every 14 days, previously was 30 days (CPT codes 99307-99310).
  - 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).

- 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: 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.

- Effective April 1st, 2022: 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:

March 18, 2020 Through the End of the PHE: Cost-sharing does not apply 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 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.

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.

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).

**2022 MEDICARE ELEGIBLE TELEHEALTH CODES**

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<thead>
<tr>
<th>2022 Standard Telehealth Codes</th>
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<td>G0506 G0508 G0509 G0513 G0514 G2086 G2087 G2088 G2211 G2212</td>
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**Codes Available up Through December 31st, 2023**

| 90953 90956 90959 90962 92507 92521 92522 92523 92524 93797 93798 |
| 96130 96131 96132 96133 96136 96137 96138 96139 97110 97112 97116 |
| 97161 97162 97163 97164 97165 97166 97167 97168 97535 97750 97755 |
| 97760 97761 99217 99224 99225 99226 99238 99239 99281 99282 99283 |
| 99284 99285 99291 99292 99315 99316 99336 99337 99349 99350 99356 |
| 99472 99476 99478 99479 99480 9422 G0422 G0423 94625 94626 |

**Codes Available for the COVID-19 PHE**

| 0362T 0373T 77427 90875 92002 92003 92004 92014 92508 92526 92550 |
| 92552 92553 92555 92556 92557 92563 92565 92567 92568 92570 92575 |
| 92588 92601 92602 92603 92604 92607 92608 92609 92610 92625 92626 |
| 92627 93750 94002 94003 94004 94005 94664 95970 95971 95972 95983 |
| 95984 96105 96110 96112 96113 96125 96127 96170 96171 97129 97130 |
| 97150 97151 97152 97153 97154 97155 97156 97157 97158 97530 97542 |
| 99218 99219 99220 99221 99222 99223 99234 99235 99304 99305 99306 |
| 99307 99324 99325 99326 99327 99332 99341 99342 99344 9345 |
| 99441 99442 99443 99468 99471 99473 99475 99477 96110 G0410 G9685 S9152 |

**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)
<table>
<thead>
<tr>
<th>CPT/HCPCS</th>
<th>Medicare Payment Limitation</th>
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<td>Not valid for Medicare purposes</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.
Payor Specific Key Points:

E-Visits/Telephone/Virtual Check Ins:

Allowable Codes:
- E-Visits: Not Allowable
- Telephone: 98966-98968, 99441-99443
- Virtual Check-In: Not Allowable

Modifier/POS: None
Patient Type: Established

Telehealth:

Telehealth Definition:
- Health First Colorado defines telemedicine as services provided under either of the below arrangements:
  - A member receives services via a live audio/visual connection from a single provider.
  - A member and a provider are physically in the same location and additional services are provided by a second (distant) provider via a live audio/visual connection.
    - The provider who is present with the member is called the originating provider
    - The provider located at a different site is called the distant provider.

Telehealth Requirements:
- Providers may only bill procedure codes which they are already eligible to bill.
- Services must meet the same standard of care as in-person care.
- Providers must document the member's consent, either verbal or written.
- Contact with the provider must be initiated by the member.
- Does not alter the scope of practice of any health care provider, nor does it authorize the delivery of services in a setting or manner not otherwise authorized by law.
- Services not otherwise covered by Health First Colorado are not covered when delivered via telemedicine.
- The use of telemedicine does not change prior authorization requirements.

Allowable Services:
- Services billed with POS 02 or 10: Allowable code set below
- Well Child Checks: Effective November 12, 2020, Health First Colorado will allow well-child check-up visits with procedure codes 99382, 99383, 99384, 99392, 99393, 99394 to be performed via telemedicine for children between the ages of 2 and 18.
  - Providers are encouraged to complete the physical examination the next time the member is seen in person.
  - Fee for Service Providers:
    - If physical examination is performed within 4 months of the telemedicine well-child check-up, void the previously paid claim with the POS 02 or 10 and resubmit for payment of the well-child check-up using the date of service of the physical examination.
  - FQHC/RHCs and IHS/Tribal 638 Providers:
    - Do not void a previous encounter when a physical examination is performed within 4 months of the telemedicine well-child check-up.
    - Indicate the well-child check-up was provided through telemedicine through GT modifier.

Non-covered Services:
- Services not otherwise covered by Health First Colorado are not covered when delivered via telemedicine.
- Telemedicine does not include consultations provided by telephone (interactive audio), email or facsimile machines.
• Services appropriately billed to managed care should continue to be billed to managed care. All managed care requirements must be met for services billed to managed care. Managed care may or may not reimburse telemedicine costs.

**Face to Face Requirement:**
- The Health First Colorado requirement for an initial face-to-face contact between provider and member may be waived when treating the member through telemedicine.
- Prior to treating the member through telemedicine for the first time, the provider must furnish each member with all the following written statements, which must be signed (electronic signatures will be accepted) by the member or the member's legal representative:
  • The member retains the option to refuse the delivery of health care services via telemedicine at any time without affecting the member's right to future care or treatment and without risking the loss or withdrawal of any program benefits to which the member would otherwise be entitled.
  • All applicable confidentiality protections shall apply to the services.
  • The members shall have access to all medical information resulting from the telemedicine services as provided by applicable law for member access to his or her medical records.
  • Note: These above requirements do not apply in an emergency.

**COVID Flexibilities: Through End of PHE:**
- Telemedicine visits will qualify as billable encounters for FQHCs, RHCs, and HIS’.
- Services allowed under telemedicine may be provided via telephone, live chat, or interactive audiovisual modality for these provider types.
- Expanded list of providers eligible to deliver telemedicine services to include physical therapists, occupational therapists, hospice, home health providers and pediatric behavioral health providers.
  • Home Health Agency services and therapies, Hospice, and Pediatric Behavioral Treatment may be provided via telephone-only.
  • Outpatient Physical, Occupational, and Speech Therapy services must have an interactive audio/visual connection with the member to be provided via telemedicine.

**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 or 10
  - **Modifiers FQ and FR**
    - FQ: The service was furnished using audio-only communication technology.
    - FR: The supervising practitioner was present through two-way, audio/video communication technology.
- **Facility (UB) claims:** Modifier GT

**Patient Location:** If no originating provider is present, then the location of the originating site is at the member's discretion and can include the member's home.

**Provider Type:** Physician, Clinic, Osteopath, FQHC, Doctorate Psychologist, MA psychologist, Physician Assistant, Nurse Practitioner, RHC
- **COVID-19:** Health First Colorado has expanded the list of providers eligible to deliver telemedicine services to include physical therapists, occupational therapists, hospice, home health providers and pediatric behavioral health providers.

**Reimbursement:** The reimbursement rate for a telemedicine service shall, as a minimum, be set at the same rate as comparable in-person service.

**Video Component: COVID-19:** Services allowed under telemedicine may be provided via telephone, live chat, or interactive audiovisual modality for these provider types.
Transmission & Originating Site Fees:
- The following procedure codes, when billed with modifier GT by appropriate providers (not FQHC, RHC, or HIS), pay the telemedicine transmission fee (an additional $5.00 to the fee listed in the most recent Health First Colorado Fee Schedule).
- When providing Family Planning via Telemedicine, appropriate providers may use the combination modifier codes of FP/GT (in this order).

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**MEDICAID ELIGIBLE TELEHEALTH CODES**

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**Cost Share Waiver:**

Effective March 18th, 2020 through End of PHE: Cost share is waived on 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.

Allowed for Outpatient Hospital Telemedicine Billing
Payor Specific Key Points:

E-Visits/Telephone/Virtual Check Ins:

**Allowable Codes:**
- **E-Visits:** 99421-99423, 98970-98972
- **Interprofessional Consultation:** 99446-99449, 99451, 99452
- **Telephone:** 99441-99443
- **Virtual Check-In:** G2010, G2012, G2250-G2252

**POS/Modifier:** POS utilized if visit would have in person (11, 21, 22, etc) and no modifier

Remote Patient Monitoring Codes:

- **Allowable Codes:** 99091, 99453, 99454, 99457-99458, 99473-99474

**POS/Modifier:** POS utilized if visit would have in person (11, 21, 22, etc) and no modifier

Telehealth:

**Allowable Codes:** UHC will allow any services on the below lists:
- Services recognized by the Centers for Medicare and Medicaid Services (CMS)
- Services recognized by the American Medical Association (AMA) included in Appendix P of the CPT code set
- Additional services identified by UnitedHealthcare that can be effectively performed via Telehealth
  - See Telehealth Allowable Codes table below for UHC specified codes

  **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.

**HIPAA Compliant Platform:** Through the COVID-19 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 or 10. 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.

**Patient Location:** 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.

<table>
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<tr>
<th>UHC ELEGIBLE TELEHEALTH CODES</th>
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**Cost Share Waiver:**

**Duration of COVID-19 PHE:** UHC 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.
**Current cost share waivers:**

<table>
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<tr>
<th>Payor</th>
<th>Cost Sharing Guidelines</th>
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<td>Aetna</td>
<td><strong>Effective March 6th, 2020, through End of PHE:</strong> Aetna will waive 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>
</tbody>
</table>
| Anthem BCBS | **Effective March 6th, 2021, through End of PHE:** Anthem will waive 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  
**Effective March 19th, 2020-October 13th, 2022,** Anthem will waive cost sharing for telephonic-only in-network visits.                                                                                           |
| Cigna       | **Effective March 13th, 2020 through End of PHE:** Cigna will waive member cost sharing for diagnostic testing and office visits/telehealth visits related to assessment and administration of diagnostic testing.                                                                                                                                                     |
| Medica      | **Effective March 1st, 2020 through End of PHE:** Medica will waive cost-sharing for in-network telehealth visits when related to administration of a COVID-19 test.                                                                                                                                                    |
| 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 |
| Medicaid    | **Duration of COVID-19 PHE:** First Health Colorado will waive 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 |
| UHC         | **Duration of PHE:** UHC 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 |
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:**
- **HCPCS:** G2025
- **Modifier:** Modifier 95 may be appended but is not required.
- **COVID-19 Related Care:** Append modifier CS

**Cost Report:**
- **RHC:** 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.”
- **FQHC:** 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 Waiver:** Effective through 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.
- Must waive collection of co-insurance from beneficiaries.
- Apply CS modifier to the service item.

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

**Reimbursement:** The RHC/FQHC telehealth payment rate is the average amount for all PFS telehealth services on the telehealth list, weighted by volume for those services reported under the PFS. For 2022 the rate is $97.24.

**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.
Telephone Services: During the COVID-19 PHE, RHC/FQHCs 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 RHC/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 RHC/FQHCs to perform Virtual Check Ins (HCPCS G2012 and G2010).
- RHCs should bill HCPCS G0071 if E-Visit or Virtual Check-In services are performed.

Reimbursement: Set at the average of the national non-facility PFS payment rates for the 5 E-visits and Virtual Check-In codes. For 2022 the rate is $23.88.
- 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.

Payor Specific Key Points:

E-Visits/Telephone/Virtual Check Ins:

Allowable Codes:
- E-Visits: Not Allowable
- Telephone: 98966-98968, 99441-99443
- Virtual Check-In: Not Allowable

Modifier/POS: None

Patient Type: Established

Telehealth:

Telehealth Definition:
- Health First Colorado defines telemedicine as services provided under either of the below arrangements:
  - A member receives services via a live audio/visual connection from a single provider.
  - A member and a provider are physically in the same location and additional services are provided by a second (distant) provider via a live audio/visual connection.
    - The provider who is present with the member is called the originating provider
    - The provider located at a different site is called the distant provider.

Telehealth Requirements:
- Providers may only bill procedure codes which they are already eligible to bill.
- Services must meet the same standard of care as in-person care.
- Providers must document the member’s consent, either verbal or written.
- Contact with the provider must be initiated by the member.
- Does not alter the scope of practice of any health care provider, nor does it authorize the delivery of services in a setting or manner not otherwise authorized by law.
- Services not otherwise covered by Health First Colorado are not covered when delivered via telemedicine.
- The use of telemedicine does not change prior authorization requirements.
Allowable Services:
- **Services billed with POS 02 or 10:** Allowable code set below
- **Well Child Checks:** Effective November 12, 2020, Health First Colorado will allow well-child check-up visits with procedure codes 99382, 99383, 99384, 99392, 99393, 99394 to be performed via telemedicine for children between the ages of 2 and 18.
  - Providers are encouraged to complete the physical the next time the member is seen in person.
  - Fee for Service Providers:
    - If physical examination is performed within 4 months of the telemedicine well-child check-up, void the previously paid claim with the POS 02 or 10 and resubmit for payment of the well-child check-up using the date of service of the physical examination.
  - FQHC/RHCs and IHS/Tribal 638 Providers:
    - Do not void a previous encounter when a physical examination is performed within 4 months of the telemedicine well-child check-up.
    - Indicate the well-child check-up was provided through telemedicine through GT modifier.

Non-covered Services:
- Services not otherwise covered by Health First Colorado are not covered when delivered via telemedicine
- Telemedicine does not include consultations provided by telephone (interactive audio), email or facsimile machines.
  - Services appropriately billed to managed care should continue to be billed to managed care. All managed care requirements must be met for services billed to managed care.

Face to Face Requirement:
- The Health First Colorado requirement for an initial face-to-face contact between provider and member may be waived when treating the member through telemedicine
- Prior to treating the member through telemedicine for the first time, the provider must furnish each member with all the following written statements, which must be signed (electronic signatures will be accepted) by the member or the member’s legal representative:
  - The member retains the option to refuse the delivery of health care services via telemedicine at any time without affecting the member’s right to future care or treatment and without risking the loss or withdrawal of any program benefits to which the member would otherwise be entitled.
  - All applicable confidentiality protections shall apply to the services.
  - The members shall have access to all medical information resulting from the telemedicine services as provided by applicable law for member access to his or her medical records.
  - Note: These above requirements do not apply in an emergency.

COVID Flexibilities: Through End of PHE:
- Telemedicine visits will qualify as billable encounters for FQHCs, RHCs, and HIS’.
- Services allowed under telemedicine may be provided via telephone, live chat, or interactive audiovisual modality for these provider types.
- Expanded list of providers eligible to deliver telemedicine services to include physical therapists, occupational therapists, hospice, home health providers and pediatric behavioral health providers.
  - Home Health Agency services and therapies, Hospice, and Pediatric Behavioral Treatment may be provided via telephone-only.
  - Outpatient Physical, Occupational, and Speech Therapy services must have an interactive audio/visual connection with the member to be provided via telemedicine.

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 or 10
  - **Modifiers** FQ and FR
    - FQ: The service was furnished using audio-only communication technology.
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.

FR: The supervising practitioner was present through two-way, audio/video communication technology.

- **Facility (UB) claims**: Modifier GT

**Patient Location**: If no originating provider is present, then the location of the originating site is at the member’s discretion and can include the member’s home.

**Provider Type**: Physician, Clinic, Osteopath, FQHC, Doctorate Psychologist, MA psychologist, Physician Assistant, Nurse Practitioner, RHC
- COVID-19: Health First Colorado has expanded the list of providers eligible to deliver telemedicine services to include physical therapists, occupational therapists, hospice, home health providers and pediatric behavioral health providers.

**Reimbursement**: The reimbursement rate for a telemedicine service shall, as a minimum, be set at the same rate as comparable in-person service.

**Video Component**: COVID-19: Services allowed under telemedicine may be provided via telephone, live chat, or interactive audiovisual modality for these provider types.

**Transmission & Originating Site Fees**:
- The following procedure codes, when billed with modifier GT by appropriate providers (not FQHC, RHC, or HIS), pay the telemedicine transmission fee (an additional $5.00 to the fee listed in the most recent Health First Colorado Fee Schedule).
- When providing Family Planning via Telemedicine, appropriate providers may use the combination modifier codes of FP/GT (in this order).

<table>
<thead>
<tr>
<th>Transmission Fees-Modifier GT</th>
</tr>
</thead>
<tbody>
<tr>
<td>90791</td>
</tr>
<tr>
<td>99201</td>
</tr>
<tr>
<td>92507</td>
</tr>
<tr>
<td>76815</td>
</tr>
</tbody>
</table>

**MEDICAID ELIGIBLE TELEHEALTH CODES**

| 76801 | 76802 | 76805 | 76811 | 76812 | 76813 | 76814 | 76815 | 76816 | 76817 | 90791 | 90792 | 90832 |
| 90833 | 9083 | 90836 | 90837 | 90838 | 90839 | 90840 | 90846 | 90847 | 90849 | 90853 | 90863 | 92507 |
| 92508 | 92521 | 92522 | 92523 | 92524 | 92526 | 92606 | 92607 | 92608 | 92609 | 92610 | 92630 | 92633 |
| 96040 | 96101 | 96102 | 96110 | 96111 | 96112 | 96113 | 96116 | 96118 | 96119 | 96121 | 96125 | 96130 |
| 96131 | 96132 | 96133 | 96136 | 96137 | 96138 | 96139 | 96146 | 97110 | 97112 | 97129 | 97130 | 97140 |
| 97150 | 97151 | 97153 | 97154 | 97155 | 97158 | 97159 | 97161 | 97162 | 97163 | 97164 | 97165 | 97166 | 97167 |
| 97168 | 97530 | 97533 | 97535 | 97537 | 97542 | 97545 | 97755 | 97760 | 97761 | 97763 | 97802 | 97803 | 97804 |
| 98996 | 98967 | 98968 | 99201 | 99202 | 99203 | 99204 | 99205 | 99206 | 99211 | 99212 | 99213 | 99214 | 99215 |
| 99382 | 99383 | 99384 | 99392 | 99393 | 99394 | 99401 | 99402 | 99403 | 99404 | 99406 | 99407 | 99408 |
| 99409 | 99417 | 99411 | 99442 | 99443 | G0108 | G0109 | G8431 | G8510 | G9006 | H0001 | H0002 | H0004 |
| H0006 | H0025 | H0031 | H0032 | H0049 | H1005 | H2000 | H2011 | H2015 | H2016 | S9445 | S9485 | T1017 |
| V5011 |      |      |      |      |      |      |      |      |      |      |      |      |      |

**Allowed for Outpatient Hospital Telemedicine Billing**

**Cost Share Waiver**:
Effective March 18th, 2020 through End of PHE: Cost share is waived on 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.
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).

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-medicare-and-medicaid-ifc2.pdf](https://www.cms.gov/files/document/covid-medicare-and-medicaid-ifc2.pdf)

- **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
under the PFS for the hospital for purposes of receiving telehealth services to be a provider

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• 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), 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 a hospital 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);
  - Home Health Agency (HHA) – 34X (agencies may separately provide and bill for outpatient PT/OT/SLP services to persons in their homes only if such patients are not under a home health plan of care)

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.
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</td>
<td>1500 FORM-ALLOWABLE</td>
</tr>
<tr>
<td></td>
<td></td>
<td>UB FORM-UNCLEAR</td>
</tr>
<tr>
<td>Anthem BCBS</td>
<td>ALLOWABLE</td>
<td>CONDITIONAL</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Check contracted fee schedule to see if E-Visit codes are allowable</td>
</tr>
<tr>
<td>Cigna</td>
<td>CONDITIONAL</td>
<td>NOT ALLOWABLE</td>
</tr>
<tr>
<td></td>
<td>Allowable on 1500 form only</td>
<td></td>
</tr>
<tr>
<td>Medica</td>
<td>ALLOWABLE</td>
<td>1500 FORM-ALLOWABLE</td>
</tr>
<tr>
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<td>UB FORM-UNCLEAR</td>
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<tr>
<td>Medicare</td>
<td>ALLOWABLE</td>
<td>1500 FORM-ALLOWABLE</td>
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<tr>
<td></td>
<td></td>
<td>UB FORM-UNCLEAR</td>
</tr>
<tr>
<td>Medicaid</td>
<td>ALLOWABLE</td>
<td>NOT ALLOWABLE</td>
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<tr>
<td>UHC</td>
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<td>1500 FORM-ALLOWABLE</td>
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<td></td>
<td></td>
<td>UB FORM-NOT ALLOWABLE</td>
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</tbody>
</table>
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://apps.availity.com/availity/web/public.elegant.login
https://www.aetna.com/individuals-families/member-rights-resources/covid19.html

Anthem BCBS:
https://www.anthem.com/docs/public/inline/Telehealth_Allowed_Services-CO.pdf

Colorado Medicaid:
https://hcpf.colorado.gov/provider-telemedicine
https://hcpf.colorado.gov/health-first-colorado-announces-telemedicine-changes
https://hcpf.colorado.gov/telemedicine-manual

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

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