To: ALL IEHP Providers and IPAs
From: IEHP – Provider Relations
Date: March 25, 2020
Subject: UPDATED: Telehealth Services Due to Limiting Exposure to COVID-19

In light of recommendations to reduce potential exposure to COVID-19, IEHP has created the following FAQ to address Providers’ questions about providing services via telehealth. It is important to note that the utilization of telehealth currently is specific to the concerns regarding COVID-19 and reducing the potential spread of the virus.

It is also important to remember that Members must consent prior to receiving telehealth, that consent is documented and that authorization processes remain the same when requesting services, regardless of whether services are being provided in-person or via telehealth.

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<th>Q. Can I provide Telehealth Services to limit potential exposure to COVID-19?</th>
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<td>A. Yes. If a Provider deems clinically that services are appropriate to provide via telehealth and Member has consented to receive services via telehealth, <strong>Update as of March 20, 2020</strong>: Due to the COVID-19, CMS and DHCS have issued guidance relaxing the regulatory requirements for the provision of telehealth.</td>
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Please refer to the latest guidance from DHCS posted on the IEHP portal COVID-19 page and found here: [https://www.dhcs.ca.gov/Documents/COVID-19/Telehealth-Other-Virtual-Telephonic-Communications031820.pdf](https://www.dhcs.ca.gov/Documents/COVID-19/Telehealth-Other-Virtual-Telephonic-Communications031820.pdf)


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<th>Q. What types of services can be provided via Telehealth?</th>
<th>A. Providers are given the flexibility to determine if a particular service or benefit is clinically appropriate based upon evidence-based medicine and/or best practices to be delivered via audio-visual, two-way, real time communication.</th>
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<td>Q. Does the Member need to consent prior to receiving Telehealth?</td>
<td>A. Yes. Providers must ask Members before initiating the use of Telehealth and document verbal or written consent. <strong>UPDATE as of March 20, 2020:</strong> IEHP understands at this time that routine, non-urgent services and elective procedures may be rescheduled or postponed and not available for Members to access in-person. If a Member does not consent to telehealth services, please advise them on any postponement of routine services that is required at this time and direct them as appropriate.</td>
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<td>Q. Are different rates paid for services provided through Telehealth vs. the same services provided in-person?</td>
<td>A. No. The rates are the same for the professional medical services provided by Telehealth or in-person. It is important to remember when billing telehealth services for Medi-Cal Members to use a POS 02 (telehealth) and a modifier 95 for services provided via synchronous, interactive audio and telecommunication systems. For Medicare Members, please use POS 02 and refer to the billing guidelines available at cms.gov. For Behavioral Health Providers, IEHP’s portal is being updated with a billing POS of 02.</td>
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<td>Q. Do I need to obtain authorization for Telehealth services?</td>
<td>A. Please follow your normal authorization processes with your contracted IPAs and contact them directly with any questions or concerns about telehealth. Services provided in an Urgent Care or Emergency Department setting do not require prior authorization.</td>
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### Q. How does Telehealth apply to Behavioral Health Treatment (BHT) for children with autism and related conditions?

A. Telehealth may be used for supervision and parent training. If caregiver consultation or direct oversight by a Provider/BCBA is needed, the Provider/BCBA must maintain appropriate records. The Provider/BCBA may use current authorizations to utilize telehealth services. **Telehealth services may not be used for 1:1 direct ABA service.**

### Q. Also specific to BHT services, if the family or Provider staff are sick, will IEHP allow cancellations?

A. IEHP will honor these cancellations with make-up sessions offered to families, but with respect to family needs and schedules. We ask Providers to maintain documentation of such.

### Q. I am an ABA Provider, may I provide direct, 1:1 service via Telehealth?

A. We here at IEHP have received numerous inquiries regarding this and effective March 25, 20202 you may TEMPORARILY provide all ABA services via telehealth as clinically appropriate until further notice.

### Q. How do I let IEHP know the services were done via Telehealth?

A. Please maintain appropriate records and notate as clinically needed on your FBAs/treatment plans. Further, there is no need to submit a separate authorization request as you may use your existing authorizations to conduct services through telehealth. Please bill as appropriate utilizing POS 02 and modifier 95 per DHCS billing guidelines.

As a reminder, all communications sent by IEHP can also be found on our Provider portal at:  
www.iehp.org > For Providers > Plan Updates > Correspondence or  

If you have any questions, please do not hesitate to contact the IEHP Provider Relations Team at (909) 890-2054.