



To: ALL IEHP Providers and IPAs
From: IEHP – Provider Relations
Date: April 1, 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.

<p>Q. Can I provide Telehealth Services to limit potential exposure to COVID-19?</p>	<p>A. Yes. If a Provider deems clinically that services are appropriate to provide via telehealth and Member has consented to receive services via telehealth, Update as of March 20, 2020: Due to the COVID-19, CMS and DHCS have issued guidance relaxing the regulatory requirements for the provision of telehealth.</p> <p>Please refer to the latest guidance from DHCS posted on the IEHP portal COVID-19 page and found here:</p> <p>https://www.dhcs.ca.gov/Documents/COVID-19/Telehealth Other Virtual Telephonic Communications V3.0.pdf</p> <p>https://www.dhcs.ca.gov/Documents/COVID-19/COVID-19 Medi-Cal Services Notice-eb-Final.pdf</p> <p>Additional guidance from CMS on telehealth can be found here:</p> <p>https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet</p>
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Q. What types of services can be provided via Telehealth?	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.
Q. Does the Member need to consent prior to receiving Telehealth?	UPDATE as of April 9, 2020: A. Per Governor Newsom’s Executive Order N-43-20, the requirement to obtain verbal or written consent and document that consent prior to initiating telehealth services is currently suspended as of April 3 rd , 2020.
Q. Are different rates paid for services provided through Telehealth vs. the same services provided in-person?	UPDATED on March 31, 2020: Per DHCS’s Emergency Telehealth Guidance to Medi-Cal Managed Care Health Plans published on March 18, 2020, <u>services are to be paid at the same rate, whether a service is provided in-person or through telehealth, if the service is the same regardless of the modality of delivery.</u> This direction pertains specifically and only to reimbursement for services provided to Medi-Cal Members. https://www.dhcs.ca.gov/Documents/COVID-19/APL19-009-Supplement-Telehealth-031820.pdf Per CMS’s Medicare Telehealth FAQs published on March 17, 2020, the following Q and A was provided for payment rates for telehealth: Q: How much does Medicare pay for telehealth services? A: Medicare pays the same amount for telehealth services as it would if the service were furnished in person. For services that have different rates in the office versus the facility (the site of service payment differential), Medicare uses the facility payment rate when services are furnished via telehealth. The CMS telehealth FAQ is being utilized by the plan to guide the processing of payments for telehealth services for CMC Medicare Members and can be found at https://edit.cms.gov/files/document/medicare-telehealth-frequently-asked-questions-faqs-31720.pdf .

<p>Q. Do I need to obtain authorization for Telehealth services?</p>	<p>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.</p>
<p>Q. How does Telehealth apply to Behavioral Health Treatment (BHT) for children with autism and related conditions?</p>	<p>UPDATED on March 25, 2020:</p> <p>A: We here at IEHP have received numerous inquiries regarding this and effective March 25, 2020 you may TEMPORARILY provide all ABA services via telehealth as clinically appropriate until further notice.</p> <p>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.</p>
<p>Q. How do I let IEHP know the BHT services were done via Telehealth?</p>	<p>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.</p>
<p>Q. Also specific to BHT services, if the family or Provider staff are sick, will IEHP allow cancellations?</p>	<p>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.</p>

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** www.iehp.org > For Providers > Plan Updates > Coronavirus (COVID-19) Advisory.

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