March 17, 2020

MEDICAID INFORMATION RELEASE MA20-07

To: All Medicaid Providers

From: Matt Wimmer, Administrator

Subject: Medicaid Provider Information Regarding Telehealth

The Idaho Department of Health and Welfare continues to monitor and prepare for impacts resulting from the 2019 Novel Coronavirus (COVID-19). We are working with the Governor’s Office and other state agencies including the Idaho Office of Emergency Management, local public health districts, and healthcare providers around the state, as well as the Centers for Disease Control and other state governments.

Slowing the progression of the virus will help ensure the healthcare system does not get overwhelmed. During this time, it is vitally important that Medicaid participants receive services and get their needs met. To inhibit the spread of the virus, and to respond to the societal disruptions taking place, Idaho Medicaid is immediately moving to reimburse for a wide array of services under a telehealth option.

Idaho Medicaid is expanding the number of codes reimbursable via telehealth beyond the code set within Information Release MA18-007. That policy statement is temporarily rescinded.

Any procedure delivered via telehealth may be covered when:
- The service can be safely and effectively delivered via telehealth, and
- The service fully meets the code definition when provided via telehealth, and
- The service is billed with a GT modifier, and
- All other existing coverage criteria are met.

This change is effective as of the date of this notice and applies to all services billed through fee for service Medicaid (claims processed by DXC, formerly Molina Medicaid Solutions) and also to all claims paid through the Idaho Behavioral Health Plan (Optum) and Idaho Smiles (MCNA).

This guidance does not apply to services paid through managed care plans for people eligible for both Medicare and Medicaid administered by Blue Cross of Idaho or Molina Healthcare of Idaho. Because of the need to coordinate with Medicare policy changes, separate guidance will be forthcoming from those plans and/or the Division of Medicaid. This guidance does not apply to non-emergency medical transportation services paid...
through MTM. These changes may be rescinded or modified in the future to respond to changing pandemic conditions.

Typically, the standard for provision of telehealth is an electronic real-time synchronized audio-visual contact between a qualified professional and participant for the purpose of treatment. The professional and participant interact as if they were having a face-to-face service. Services that can be provided effectively telephonically without real-time video may also be covered via telehealth. Services that cannot be effectively completed without visual interaction are not included in this modification and continue to require a video component.

Claims for services delivered via telehealth will be reimbursed at the same rate as face to face services. As is generally standard for the provision of Medicaid services, administrative services from the provider, such as scheduling, registration, etc. will not be covered as telemedicine services.

Because of the need to respond quickly, our system is not yet fully configured to support all coverage and some services billed as telehealth may not pay immediately. Our systems team is working on necessary changes to effectuate this policy and will reprocess claims to ensure appropriate payment consistent with this policy as soon as possible.

Providers must continue to maintain appropriate documentation of all services provided and related to medical necessity. Unless otherwise explicitly noted, licensure requirements and prescribing authorities continue to exist and should be followed. Other considerations include:

- Place of Service (POS) is required on all claims
- All claims must be billed with the GT modifier in addition to the CPT® code.
- Due to the need for social distancing, self-quarantine and other unique situations, Idaho Medicaid understands that providers may be accessing their EHRs and providing telehealth services off-site from their usual POS. Non-standard POS locations should bill with POS code 99.
- Data privacy and security regulations continue to have the full force of law, and providers should make all reasonable and prudent efforts to protect Personally Identifiable Information (PII) and Protected Health Information (PHI).
- Claims must be submitted under the NPI of the provider who is performing the service.
- Reporting of test results only is not covered as a telemedicine service.

While the goal is to facilitate the provision of necessary services to Medicaid participants, we remind all providers to be mindful of actions that could carry fraud, waste, and/or abuse implications.

In addition to expanding telehealth options and encouraging their use, Idaho Medicaid also urges all providers to defer wellness visits, routine dental visits, and elective surgeries until such time as the Governor’s emergency declaration is lifted. Doing so will allow fewer face-face interactions between needed providers and patients (further limiting contagion) and will free up much needed Personal Protection Equipment (PPE) and medical devices (such as ventilators) that may be needed to serve critical patients in the coming days.
To the extent practical, we strongly encourage the use of telehealth to provide services to Medicaid members. Further guidance on use of telehealth will be forthcoming.

We thank you for your service to Idaho Medicaid participants and appreciate your work to address this public health threat.

MW/cab