

Emergency Telehealth Rules – An Overview for CPC Practices

March 26, 2020

Agenda

- ❖ Quick CPC update
- ❖ Telehealth
- ❖ What's next and reminders
- ❖ Q & A



Quick CPC Update



Department of
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CPC Updates for 2021

- Discussions have begun to determine any potential changes for 2021 program year
 - Input was received from the managed care plans
- Building a new pharmacy efficiency metric
- Working on 2021 rule updates
- For CPC practices who have ideas for improvement – complete the survey questionnaire link, being sent via the CPC listserv

Emergency Telehealth Updates



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Added Provider Types

In addition to those who can provide telehealth services under 5160-1-18, the emergency rule 5160-1-21 adds:

Audiologist, Audiology aide
Occupational Therapist, OT Assistant
Physical Therapist, PT Assistant
Speech-Language Pathologist, SLP aides
Individuals holding a conditional license under 4753.071 of the Revised Code
Medicaid School Program practitioners
Dietitians
Supervised practitioners and trainees defined in 5160-8-05
Other as designated by the Director of ODM (to be communicated in guidance to providers)

Added Covered Services

In addition to covered telehealth services under 5160-1-18, the emergency rule 5160-1-21 adds:

Remote evaluation of recorded video or images
Virtual check-ins
Online digital evaluation and management services
Remote patient monitoring
Audiology, speech-language pathology, physical therapy, and occupational therapy
Medical nutrition services
Lactation counseling provided by dietitians
Psychological and neuropsychological testing
Smoking and tobacco use cessation counseling
Developmental test administration
Other services as designated by the director of ODM

Reinstated Originating Site Fee

- Q3014 will be an available code
- Can be billed in conjunction with a separate evaluation and management service provided on the same day
- Limit of 1 per day, per patient
- Rate is \$21.28

Removed Location Restrictions

- ▶ **Patient can be anywhere**
 - Includes home, temporary housing, school, community, etc.
- ▶ **Practitioner can be anywhere**
 - Any valid place of service code will be accepted (except 09)
- ▶ **New and established patients can be seen by any eligible practitioner**

Expanded Telehealth definition

During the state of emergency, telehealth is defined as:

- Delivery of services via live, interactive, real-time electronic communication with audio and video elements; **OR**
- Asynchronous activities that do not have both audio and video elements. This includes:
 - Telephone calls
 - Images transmitted via fax or other means
 - Electronic mail

Providers
should use
their best
judgment

Removes Active Patient Requirements

Patients are not required to be “active”

Not required to have at least one in-person physical exam within the previous twelve months

Practitioner location can be anywhere even if the patient is not active (not a change for CPC practices)

Office of Civil Rights Notification

- Adopts Office of Civil Rights “Notification of HIPAA enforcement discretion for telehealth remote communications during the COVID-19 nationwide public emergency”
 - Covered entities subject to HIPAA may communicate with patients remotely even though some technologies do not fully comply with HIPAA rules

Temporary HIPAA Changes

Providers:

- Can use any audio or video **non-public facing** remote communication product
 - Facebook Live, Twitch, TikTok are public facing and should not be used for telehealth
- Should notify patients that potential privacy risks are introduced with use of these third-party applications
 - Providers should enable all available encryption and privacy modes when using these
- Are to exercise professional judgment in the use of telehealth

Telehealth Resources

Use the link from the ODM home page for more info - a new Telehealth billing guidance is **coming soon!**

FOR OHIOANS > COVID-19 Emergency Actions



QUESTIONS ABOUT COVID-19?

VISIT [CORONAVIRUS.OHIO.GOV](https://coronavirus.ohio.gov) OR CALL **1-833-4-ASK-ODH** FOR ANSWERS.

MEDICAID EMERGENCY RULE EXPANDS TELEHEALTH SERVICES. CLICK [HERE](#) FOR MORE INFORMATION.



The best place to access the emergency rule and the appendix with covered codes is on the Register of Ohio Website

COVID-19 Emergency Actions

The Ohio Department of Medicaid (ODM) and the Ohio Department of Mental Health and Addiction Services (OhioMHAS), in partnership with the Governor's Office, executed emergency rules to expand and enhance telehealth options for Ohioans and their providers. These rules relax regulations so more people can be served safely in their homes, rather than needing to travel to health care providers' facilities. This set of regulatory changes is being collectively implemented by our departments to help reduce risk of exposure to COVID-19 for patients, their families, and our health care workforce that is engaged in the community response to COVID-19. Links to the new rules can be found below.

Telehealth is the practice of caring for patients remotely when the provider and patient are not physically present with each other. It supports long-distance clinical health care, patient and professional health-related education, public health and health administration. The ODM/MHAS emergency rules ensure both new and existing patients can access a wide variety of telehealth services. They ease restrictions on provider/patient locations and the types of technologies and interactions that can be used for telehealth services.

Please note: the OhioMHAS rule change applies to all community behavioral health providers certified by OhioMHAS (Medicaid provider types 84 and 95.) ODM's new telehealth rule applies to all individuals covered by Medicaid and many types of practitioners: doctors, nurse practitioners, podiatrists, psychologists, occupational and physical therapists, audiologists, speech-language pathologists, dietitians, and behavioral health clinicians. ODM's rule allows telehealth services to be billed by independently practicing clinicians, as well as hospitals and their out-patient facilities, Federally Qualified Health Centers (FQHC), emergency rooms, and OhioMHAS-certified providers. ODM's rule applies to Medicaid fee-for-service, Medicaid Managed Care Plans, and MyCare Ohio Plans.

Ohio Medicaid Emergency Rules

- ODM Telehealth FAQs
- ODM Emergency Telehealth Rule
 - Appendix to Rule 5160-1-21
- ODM Telehealth Executive Order
- [Coronavirus.ohio.gov](https://coronavirus.ohio.gov)
- MITS BITS Newsletter

<http://www.registerofohio.state.oh.us/rules/search/details/312431>

What's Next and Reminders



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Upcoming CPC Key Dates:

2020 PMPM Payments



Q2 Payments will go out by the end of :

April 2020

2020 Quarterly Reports



Q1 2020 Reports are estimated to post in:

April 2020

2020 Attribution Files



Q2 Files will post on the MITS Portal in:

April 2020

Don't Forget

In-Person Learning Sessions coming:

Around July/August 2020



New Provider Resource

A new training video has been posted to the CPC webpage!

Learn more:

- **How to Setup a MITS Agent Account and Access CPC Reports - Video *NEW***
- Managed Care Plan's Consolidated Resource Guide
- Ohio's Vision for Primary Care
- Frequently Asked Questions
- Provider Assistance
- Medicare Comprehensive Primary Care Plus (CPC+)
- Ohio CPC 2020 Practice List

Upcoming Webinars

4/23/2020 CPC 101

5/28/2020 CPC 201

6/25/2020 Best Practice

CPC Webpage:

<http://medicaid.ohio.gov/Providers/PaymentInnovation/CPC.aspx>

Information on:

- CPC 2020 program year
- CPC enrollment
- CPC payment
- CPC requirements
- CPC reporting
- CPC provider webinars

Don't Forget to Signup for our CPC Listserv
to receive all the important
communication for the 2020 program year

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QUESTIONS?

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If you have any questions, you will need to contact our provider assistance team via the IVR at, 1-800-686-1516, option 5. You must enter two of the following: tax ID, 7-digit Medicaid ID, or NPI in order to authenticate and speak with a representative

