

COVID-19 Exceptions for Provider Payments and Billing

Number: PRPP1.1

AS OF 3/18/2020

This is an exceptions policy driven by the extraordinary demands of the COVID-19 pandemic. This policy is in full effect and supersedes all existing payment policies with which it may conflict as of 3/18/2020 and extending to April 30th or as such date as is communicated by OSUHP Provider Relations. Please check back to this policy location often, as its contents may change. The document can be found at (www.osuhealthplan.com)

Key Payment Exceptions

Telehealth Services

The existing OSUHP Telehealth Policy PR1.0 can be found at www.osuhealthplan.com. Exceptions to this policy are below.

Providers are accountable to understand and comply with the latest Privacy and Security guidance from the State and Federal government. It is OSUHP's desire to provide coverage for services and delivery methodologies as allowed by State and Federal regulatory bodies. OSUHP intends to process updates to this exceptions policy as new guidance and regulations are approved by the responsible government entities.

1. The following provider types will now be available for coverage in addition to those listed in the OSUHP Telemedicine Policy, when appropriately billed codes and modifiers are utilized:
 - Supervised practitioners and supervised trainees
 - Audiologists and their aides
 - Occupational therapists and their assistants
 - Physical therapists and their assistants
 - Speech/language pathologists and their aides
 - ABA therapists and ABA aide services
 - a. For Physical Therapists, Occupational Therapist, Speech-Language Pathologists, OSUHP is generally covering evaluation, re-evaluation, and exercise review (97161-97168, 97750, 97110, 92521-92524, 92507, 92508).
 - b. All practitioner types eligible to render services through the use of telehealth as part of this exceptions policy can be found in the Ohio Telehealth During State of Emergency Ruling 5160.1.21 Section B(1).
[http://www.registerofohio.state.oh.us/pdfs/5160/0/1/5160-1-21 PH EM NE RU 20200320 1032.pdf](http://www.registerofohio.state.oh.us/pdfs/5160/0/1/5160-1-21_PH_EM_NE_RU_20200320_1032.pdf)
2. For allowed services, initial sessions to establish care will no longer be required to be conducted face-to-face (in-person). Providers are encouraged to use sound clinical judgement when exercising this exception and choosing to establish care via telehealth methodologies. Initial visits to establish care must occur via live audio/visual connection. Telehealth visits to establish care may not occur via audio only.



3. Providers utilizing telehealth delivery do not have to possess licensure within the state in which the patient resides or receives service. Providers must still possess valid clinical licensure to practice.
4. Providers may utilize additional non-traditional technologies for telehealth services. We encourage providers to follow HIPAA guidelines to the greatest extent possible and act in the best interest of preserving member privacy when providing telehealth services. Please reference the latest Health and Human Services guidance here (<https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html>). Providers are encouraged to notify patients that these third-party applications potentially introduce privacy risks, and providers should enable all available encryption and privacy modes when using such applications.
5. Providers may now render services from non-traditional distant sites when clinically necessary. We encourage providers to follow HIPAA guidelines and to have access to patient medical records at their site to the greatest extent possible and act in the best interest of preserving member privacy when providing telehealth services.

Telehealth Online Resources:

- **CMS.gov Telehealth Codes CY2020**
 - <https://www.cms.gov/Medicare/Medicare-General-Information/Telehealth/Telehealth-Codes>
- **MLN Telehealth Fact Sheet CY2019**
 - <https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/Downloads/TelehealthSrvcsfctshs.pdf>
- **CMS.gov Newsroom Updates**
 - <https://www.cms.gov/newsroom>
- **Ohio Telehealth During State of Emergency Ruling**
 - http://www.registerofohio.state.oh.us/pdfs/5160/0/1/5160-1-21_PH_EM_NE_RU_20200320_1032.pdf