

## **COVID-19 Exceptions for Provider Payments and Billing**

Number: PRPP1.1

Updated: 8/11/2020

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 3/16/2020 and extends through the end of the national public health emergency for COVID-19, 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](http://www.osuhealthplan.com)).

### **Key Payment Exceptions**

#### **COVID-19 Testing**

In response to the COVID-19 public health emergency, the US President has signed into effect the Families First Coronavirus Response Act effective. Under that act, medically necessary evaluation and testing for COVID-19 will be covered at 100% with no out-of-pocket costs. No Prior Authorization will be required, and there will be no network restrictions placed upon where members can be evaluated and tested. Services must be prescribed by your physician. Administrative requirements, such as for school, employment or travel, are excluded from coverage. If you have questions, please contact the OSU Health Plan at 614-292-4700.

#### **Expanded Telehealth Services**

The existing OSUHP Telehealth Policy PR1.0 can be found at ([www.osuhealthplan.com](http://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

- 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>
- 2. Interactive audio/video visits and audio only phone visits will be reimbursed at in-office payment schedules throughout the COVID state of emergency and/or until further notice. Providers are to follow current billing guidelines and use appropriate E&M codes, place of service codes, and telehealth modifiers.
- 3. 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. Telehealth visits to establish care may occur via audio/video and audio only when access to technology is limited.
- 4. 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.
- 5. 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.
- 6. 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.
- 7. Preventive services utilizing codes 99381-99397 (and appropriate POS and modifier) will be covered via telehealth during this state of emergency when a member is deemed low risk/healthy by the rendering provider and the provider determines, given the extenuating circumstances, that they can adequately assess the member through a virtual visit.

### **Telehealth Services for Behavioral Health**

For medical and outpatient behavioral telehealth visits, providers can utilize both interactive audio/video and audio-only.

For ABA Therapists and aides OSUHP will generally be covering:

Category	CPT Code	Description
Behavioral Health	97151	Adaptive behavior assessment by phys/qhp
Behavioral Health	97153	Adaptive behavior treatment by tech
Behavioral Health	97154	Group adaptive behavior treatment by tech
Behavioral Health	97155	Adaptive behavior treatment by phys/qhp
Behavioral Health	97156	Family adaptive behavior treatment by phys/qhp

### Telehealth Services for Physical, Occupational, and Speech Therapy

For PT/OT/ST provider visits, interactive audio AND video technology must be used. OSUHP will be generally covering:

Category	CPT Code	Description
Physical Therapy	97110	Therapeutic procedure, 1+ visits, each 15 minutes
Physical Therapy	97112	Therapeutic procedure, 1+ areas, each 15 minutes
Physical Therapy	97116	Gait Training
Physical Therapy	97129	Therapeutic intervention, 1 <sup>st</sup> , 15 minutes
Physical Therapy	97130	Therapeutic intervention, additional, each 15 minutes
Physical Therapy	97161	Physical therapy evaluation – low complexity
Physical Therapy	97162	Physical therapy evaluation – moderate complexity
Physical Therapy	97163	Physical therapy evaluation – high complexity
Physical Therapy	97164	Physical therapy re-evaluation
Physical Therapy	97750	Physical performance and measurement with report
Physical/Occupational Therapy	97530	Therapeutic procedure, 1 to 1 contact, each 15minutes
Occupational Therapy	97165	Occupational therapy evaluation – low complexity
Occupational Therapy	97166	Occupational therapy evaluation – moderate complexity
Occupational Therapy	97167	Occupational therapy evaluation- high complexity
Occupational Therapy	97168	Occupational therapy re-evaluation
Occupational Therapy	97535	Self-care/home management training, each 15 minutes
Speech Therapy	92521	Evaluation of speech fluency
Speech Therapy	92522	Evaluation of speech sound production
Speech Therapy	92523	Speech sound language comprehension
Speech Therapy	92524	Voice analysis
Speech Therapy	92507	Treatment of speech, language, voice, comm, auditory
Speech Therapy	96105	Assessment of aphasia
Speech Therapy	96125	Cognitive test

### 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/TelehealthSrvcsfctsh.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](http://www.registerofohio.state.oh.us/pdfs/5160/0/1/5160-1-21_PH_EM_NE_RU_20200320_1032.pdf)