

## Telehealth Talking Points Exceptions Due to COVID-19

Updated: 4/8/2020

Please find attached the existing policy points related to Telehealth and the new COVID-19 Payment Policy Exceptions. For your convenience, below are a set of talking points highlighting the important information. For questions, see the individual policies or call the Health Plan at 614-292-4700.

### What Is Telehealth?

Telehealth is the direct delivery of health care services to a patient (a) via synchronous (“at the same time”), interactive, real-time electronic communication comprising both audio and video elements or (b) activities that are asynchronous (“not at the same time”) and do not have both audio and video elements such as telephone calls, images transmitted via facsimile machine, and electronic mail.

### Eligible Providers:

#### Which provider types are eligible to render Telehealth services?

- **Standard:** The OSU Health Plan (OSUHP) includes telemedicine through the following providers: physicians, certified nurse practitioners, physician assistants, certified nurse midwives, clinical nurse specialists, clinical psychologists, licensed independent social workers, licensed professional clinical counselors, licensed independent marriage and family therapists, licensed independent chemical dependency practitioners, and registered dietitians or nutrition professionals.
- **COVID-19 Exception:** OSUHP covers all other eligible providers consistent with the State of Ohio’s ruling (e.g., 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, aides, ABA [Applied Behavior Analysis] therapists and ABA aide services).

#### What licensure do eligible providers need to render Telehealth services?

- **Standard:** OSUHP allows for the use of providers licensed to provide telehealth services only in the state in which the member is residing.
- **COVID-19 Exception:** OSUHP covers all telehealth services for any appropriately licensed provider regardless of the state in which they hold their license or certification.

### Technology:

#### How can Telehealth be provided to OSUHP members?

- **Standard:** OSUHP covers telehealth provided only through HIPAA-compliant platforms.
- **COVID-19 Exception:** OSUHP covers telehealth platforms use provided by practitioners acting in the best interest of the member. Along with audio only phone visits, the following technology platforms may be used during the current public health emergency: Popular applications that allow for video chats including Apple FaceTime, Facebook Messenger video chat, Google Hangouts video, or Skype. 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.
  - The following platforms are NOT approved: Facebook Live, Twitch, Snapchat, TikTok, YouTube and similar video communication applications that are public facing.

- OSUHP strongly recommends members and providers to take every possible precaution to maintain privacy and security of member data when utilizing non-HIPAA compliant platforms.

**Establishing Care:**

**How can Telehealth care be established?**

- **Standard:** Telehealth care can be established after an initial face-to-face visit is conducted with a patient and virtual care is deemed appropriate.
- **COVID-19 Exception:** OSUHP is waiving the required face-to-face visit needed to establish Telehealth care during the current public health emergency. Telehealth care may now be established via audio/video visits and audio only visits when access to technology is limited.

**Place of Service:**

**From what sites can Telehealth be conducted?**

- **Standard:** Network providers may conduct a telehealth visit from certain clinically appropriate locations.
- **COVID-19 Exception:** Network providers may conduct a telehealth visit from any private, secure location that will support member privacy. OSU Health Plan is waiving the CMS originating site restriction and audio/video requirement from March 16, 2020 until further notice.
  - Providers may render services through non-traditional sites and via audio only when clinically necessary while a member is at home or any other private location.

**Useful Links:**

OSU Health Plan Telehealth Policies and Updates:

<https://osuhealthplan.com/forms-and-faqs>

*Providers are responsible to provide telehealth services in accordance with OCR's notice:*

<https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html>

*For more information, see CMS FAQs:*

<https://edit.cms.gov/files/document/medicare-telehealth-frequently-asked-questions-faqs-31720.pdf>