

## COVID-19 Telehealth Expansion Update

The safety and security of our members – and of all North Dakotans – remains the top priority during these unprecedented times. Blue Cross Blue Shield of North Dakota (BCBSND) remains committed to ensuring members can connect with providers.

BCBSND has thoroughly reviewed the guidance set forward on March 17th by the Centers for Medicare & Medicaid Services (CMS). This guidance from CMS is in alignment with what will be considered allowable for BCBSND members, on a temporary basis (during the declared COVID-19 emergency period). These changes are effective March 16, 2020.

In addition, BCBSND and the Blue Shield Federal Employee Program® (FEP®) have decided to waive cost-sharing for all telehealth services for fully-insured members. BCBSND will work with self-funded clients related to further expanded coverage for their employees.

The following is applicable during the COVID-19 emergency period:

Type of Service	What is the Service	HCPCS/CPT Code	Patient Relationship with Practitioner
<b>Telehealth visit</b>	Visit with a provider that uses a telecommunication system connecting the patient with the provider.	<ul style="list-style-type: none"> <li>• 99201-99215</li> <li>• G0425-G0427</li> <li>• G0406-G0408</li> </ul>	New or established patients
<b>Virtual Check-In</b>	A brief communication via telephone or other telecommunication device to decide whether an office visit or other service is needed. A remote evaluation of recorded video and/or images submitted by an established patient.	<ul style="list-style-type: none"> <li>• 99441-99443</li> <li>• G2012</li> <li>• G2010</li> </ul>	For established patients

<b>Digital Telehealth (E-visits)</b>	Digital communication initiated by the member to a provider through the provider's online patient portal.	<ul style="list-style-type: none"> <li>• 99421-99423</li> <li>• 98970-98972</li> <li>• G2061-G2063</li> </ul> <p>*During the COVID-19 emergency period only, providers must use modifier 95 when reporting face-to-face or non-face-to-face digital visits to ensure correct claims processing.</p>	For established patients
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CMS guidance can be found here: <https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet>

Given BCBSND's alignment with CMS, the common questions from the last communication have been updated. Please review as information has changed.

### Common Questions

**1. Does this include all services, even therapy and office visits?**

Yes, in an effort to minimize exposure, many providers are offering telehealth options. Telehealth visits are subject to the member's regular benefits.

We expect a variety of services to be offered through telehealth visits. These services may include, but are not limited to the following:

- Office visits for patients
- Physical therapy (PT) plan evaluation
- Occupational therapy (OT) plan evaluation
- Speech therapy (ST) plan evaluation
- Behavioral health and substance use disorder treatment
- Diabetes education
- Nutrition counseling

For services outside of E&M visits and telemedicine/digital visits, providers should use the appropriate CPT or HCPCS code and applicable modifier for the services rendered, if the services meet all criteria of the services rendered. Provider should submit Place of Service 02 if the provider is rendering services through a telehealth communication system.

**2. Will reimbursement for telehealth visits where the patient is at home be the same as an in-person visit?**

Many telehealth services (indicated by place of service 02) have a site of service

differential, so reimbursement may be less when provided via telehealth.

Rates associated with codes and corresponding site of service differentials are only available through the fee schedule portal. If you have not registered for access to the portal, you can register at [www.bcbsnd.com/FeeSchedules](http://www.bcbsnd.com/FeeSchedules). For questions regarding fee schedules, please email [feeschedules@bcbsnd.com](mailto:feeschedules@bcbsnd.com).

**3. Do participating providers need anything additional to get set up to provide telehealth services?**

Possibly.

- When providing services out of provider's affiliated billing location, no changes should be needed.
- When providing services out of a location that is not currently affiliated to the provider, the location must be added to the provider's profile in order to submit claims.
- If providers opt to perform services from their own home temporarily, rather than their office/billing location, providers will not need to add their home address to their profile. Claims should be submitted as if the provider was in their main practice location.
- When utilizing providers outside of the BCBSND service area there are separate billing requirements. Providers are encouraged to email specific telehealth questions to [prov.partners@bcbsnd.com](mailto:prov.partners@bcbsnd.com).

**4. Can providers utilize FaceTime/Facebook/Skype to perform services?**

Yes, per CMS guidance, the HHS Office for Civil Rights (OCR) announced on March 17, 2020, that it will waive potential HIPAA penalties for good faith use of telehealth during the nationwide public health emergency due to COVID-19. Further information is available: <https://www.hhs.gov/sites/default/files/hipaa-and-covid-19-limited-hipaa-waiver-bulletin-508.pdf>

**5. Does this include phone conversations with patients?**

Yes, provided that all the components of the applicable CPT or HCPCS codes are met (ex. 99441).

**6. Is all cost-share waived during this time?**

Yes, all cost-shares will be waived for telehealth services for our fully-insured and FEP membership during the COVID-19 emergency period.

However, for self-funded accounts the waiving of cost shares only applies to those services pertaining to the testing of COVID-19. Visits regarding other medical diagnosis (i.e. psychological, substance abuse services, PT, OT, ST, etc) will continue to apply normal benefit cost sharing amounts. BCBSND will work with self-funded clients related to further expanded coverage for their employees.

As communicated previously, if a telehealth visit results in the ordering of the



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