

Telehealth 101 Affinity Group

Session 2 : HIPAA and Billing

April 24, 2020



Legal Disclaimer

Our best efforts were made to make the information included in this presentation as current and accurate as possible as of the date it was presented and is not intended as legal advice. Please consult the necessary professionals or regulatory agencies for more updated/detailed and legal requirements and advice.

Quick Logistics



Please mute your microphones during the presentation.



This presentation will be recorded and sent to registered participants.



Please enter your questions in the chat box.



Share your experience with the group.



Be kind – We are all learning together.

New Telehealth Website

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To help health care providers manage patient care during the coronavirus disease (COVID-19) pandemic, Mountain-Pacific Quality Health provides support for the adoption of telehealth. Offering telehealth services allows people with Medicare, who are at high-risk for contracting COVID-19 or have other conditions, to avoid exposure to health care professionals and other patients. It also helps providers maintain fee-for-service revenue while practicing physical distancing and wearing personal protection equipment (PPE).

The benefits of implementing telehealth will reach beyond the current pandemic, expanding options and providing flexibility for both providers and patients.

What questions do you have? See if your question has already been answered on our FAQs page. If you do not find the answer you need, submit a question.

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Telehealth Services Support under
Quality Improvement Initiatives

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Kristen Range-Schuster



Polling Questions

1. Approximately how many telehealth visits were you able to complete last week?
2. What was EASIER than you expected in providing Telehealth?
 - a. Billing
 - b. Workflow
 - c. HIPAA
 - d. Staff buy-in
 - e. Patient willingness to use technology
3. What is your team's biggest hurdle right now?
 - a. Buy-in from providers
 - b. Buy-in from staff
 - c. Billing/documentation
 - d. Technology

Choosing a Platform: Privacy & Security

Susan Clarke

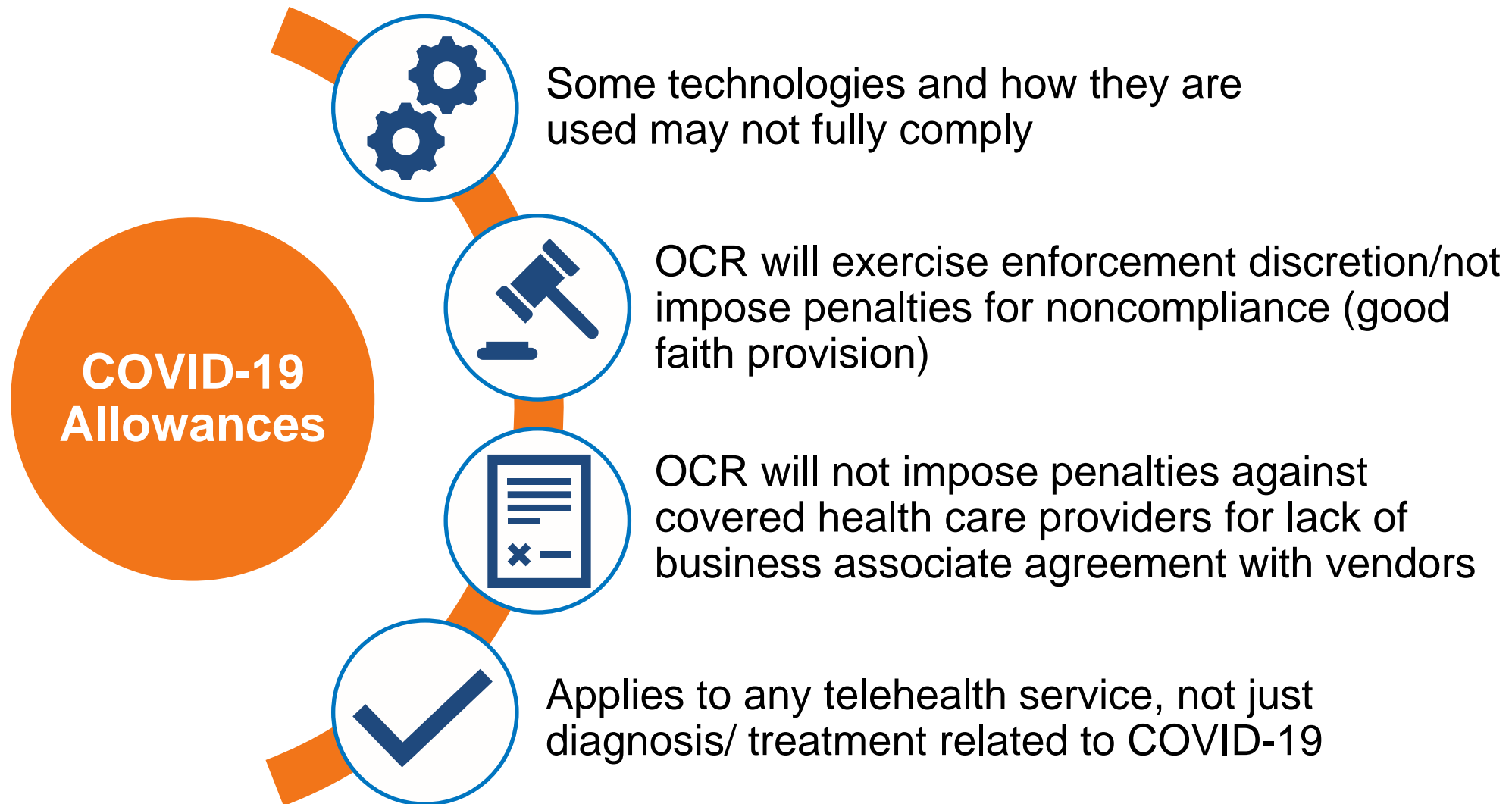


Relaxing of HIPAA to Promote Telehealth Visits during COVID-19

HHS Office of Civil Rights (OCR) will exercise enforcement discretion and waive penalties for HIPAA violations against health care providers who serve patients in good faith through everyday communications technologies (e.g., FaceTime, Skype).

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

HIPAA Standing Down for Telehealth



Technology

Acceptable Non-Public-Facing Applications

- Apple FaceTime
- Facebook Messenger video chat
- Google Hangouts video
- Skype

- Notify patients of potential privacy risks
- Enable all available encryption and privacy modes

Choosing a Platform: Patient Friendly

Today's Most Commonly Used Communications during COVID-19

Vendor	Product	Platform	Encryption/ Authentication	Security Considerations	Collect to Connect
Apple	FaceTime	Not recommended outside Apple iOS	AES-256-bit, End-to-end	Calls not stored on Apple's servers; iCloud Backup can be turned off	Phone and email or Apple ID
Microsoft	Skype	Android, Apple, Windows	AES-256-bit, End-to-end	Data routed through Microsoft; for end-to-end must use Private Conversation	Phone and email or Skype ID
Microsoft	Teams	Only works within your Office 365 environment; may not be viable solution	AES-256-bit	Data resides in Office 365; subject to security controls, retention and ediscovery	User ID only if assigned through work
Facebook	WhatsApp	Android, Apple, Windows	AES-256-bit, End-to-end	Facebook no access to contacts or conversations	Phone and email or username
Facebook	Messenger	Android, Apple, Windows	AES-256-bit, Not encrypted by default	Facebook no access to contacts or conversations; for end-to-end, must use Secret Conversation	Phone and email or username
Google	Google Hangouts	Android, Apple, Windows	AES-256-bit & SHA-1	Some data resides in Google	Phone and email

Compliance Pitfalls

Sign up for Listservs below



Dangers of disclosures to media or on social media



Curiosity and record snooping



Security for new remote workers



Stress or panic-led disclosures

<https://www.hhs.gov/hipaa/for-professionals/list-serve/index.html>

<https://public.govdelivery.com/accounts/USCMS/subscriber/new?preferences=true#tab1>

Billing and Reimbursement

Amber Rogers and Dr. Eric Arzubi

Telehealth E&M Codes

NEW PATIENT		
	Current Procedural Terminology (CPT)[®] Typical Time	CMS Typical Time
99201	10 min.	17 min.
99202	20 min.	22 min.
99203	30 min.	29 min.
99204	45 min.	45 min.
99205	60 min.	67 min.

ESTABLISHED PATIENT		
	CPT[®] Typical Time	CMS Typical Time
99212	10 min.	16 min.
99213	15 min.	23 min.
99214	25 min.	40 min.
99215	40 min.	55 min.

CMS	Commercial
Bill POS where the patient would have been seen	POS 02
Services will be paid at the higher, non-facility rate	Bill Modifier GQ or GT
Bill modifier 95	

*FQHC and RHC in rule-making process: Likely will bill a Healthcare Common Procedure Coding System (HCPCS) code and paid at non-facility physician fee schedule (PFS) rate

Non-Telehealth Billable Codes

PAYMENT FOR PHONE CALLS BY E&M PROVIDER

99441	5-10 min.	\$13.32
99442	11-20 min.	\$26.64
99443	21-30 min.	\$39.60

*Not billable for FQHC and RHC at this rate

For registered dietitians, social workers, physical/ occupational therapists, speech-language pathologists

98966	5-10 min.	\$13.32
98967	11-20 min.	\$26.64
98968	21-30 min.	\$39.60

Virtual Check-In	Non-Facility Payment	Facility Payment
G2012	\$14.78	\$13.35
G2010	\$12.27	\$9.38






*These codes may not be used as a follow-up from an E&M visit for the same problem or if the virtual check in or e-visit results in and E&M visit within 24 hours or soonest available appointment.

Online Digital E&M Visits

Code	Description	National	National Facility Payment	HCPCS Codes
99421	5-10 min.	\$15.52	\$13.35	
99422	11-20 min.	\$31.04	\$27.43	FQHC and RHC bill G0071 payment rate TBD
99423	21 or more min.	\$50.16	\$43.67	
G2061	Online assessment; 5-10 min.	\$12.27	\$12.27	For use by clinicians who do not have E&M in their scope of practice (e.g., physical/occupational therapists, registered dietitians, speech-language pathologists, social workers)
G2062	11-20 min.	\$21.65	\$21.65	
G2063	21 or more min.	\$33.92	\$33.56	

*If patient had E&M service within 7 days, these codes may not be used for that problem. If an E&M visit occurs as a result of the online visit, the time/MDM may be used to select the E&M service, but these codes cannot be used.

Telehealth Visit vs. Phone or E-visit

-  To drive revenue, focus on telehealth visits
-  Paid at non-facility rates for non-Federally Qualified Health Centers (FQHCs)/Rural Health Clinics (RHCs)
-  Code selection is based on medical decision-making (MDM) or all the time associated with encounter on that day
-  Waiver allows removal of documentation requirements for history and physical exam
-  Can be billed by all evaluation and management (E&M) providers, including FQHC and RHC

Not Considered Telehealth

1. Phone calls
2. Virtual check-ins
3. E-visits

 How many of you are using these?

 What is your level of interest in learning more on a scale from 1-5?

Your Turn



Training tips and tricks regarding billing?



What was your biggest success?



How have you addressed privacy concerns?

Questions & Answers



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Tools and Resources

Telehealth website address:

<https://www.mpqhf.org/QIO/telehealth-services-support/>

The following handouts from today will be distributed to registrants:

- Billing Worksheet



➔ **A one-stop shop for all things telehealth!**

Next Sessions

- Sessions are 30-45 min. in length.
- Subject matter experts from today's session are available at all sessions.
- You do not need to register. You will receive emails with the recording from the previous week and log-in info for the coming week.
- Email questions for the next session to Amber Rogers at arogers@mpqhf.org.

Friday, April 24
1:00 PM MDT

 **Session 2**
Fine Tuning
Your Process

Friday, May 1
1:00 PM MDT

 **Session 3**
Remaining Gaps

Friday, May 8
1:00 PM MDT

 **Session 4**
Level Up

Next Steps

Start where you are comfortable

If needed, schedule a coaching call with one of our team members

Share your progress or any speed bumps at next session

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Thank you!

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