Telehealth Quick Start Guide

PRIMARY CARE & FQHC/RHC FOCUS
March 27, 2020
OVERVIEW

● A Quick Introduction to gpTRAC
● Prerequisites
● Policies
● Procedures
● Practice
Some Background Information and Principles

1. **Services legally occur at the patient’s physical location.** The provider must be licensed (and credentialed) to provide services at that location.

2. Specific consent is generally required, but it may be verbal. It should be included in your general consent, if possible, and regularly revisited.

3. Procedures should be consistent and mirror usual procedures as much as possible. Standardized procedures help everyone feel more comfortable.

4. In a clinical emergency, use available emergency procedures and resources. Telemedicine services are generally NOT intended for emergencies.

5. This guide focuses on providing encounters via live video.
PREREQUISITES

Patient portal (or other channel to communicate with patients)

Video account & settings (or equivalent) or eVisit Platform (various)

Equipment (computers, webcams, smart phones, etc.)

Network connections
Patient Portal - Or Other Communication Channel

The Portal (or other secure channel) will be needed to:

- Set and confirm scheduled appointments
- Send links and passwords for video calls
- (Optional) Collect patient information before a call
- (Optional) Conduct an eVisit (as defined by Medicare)
Technology Spectrum

Separate Video

- Operate independently of your EMR
- “Dual systems” - video on one screen, EHR on the other (or split windows)

“eVisit” Platforms

- Patient portal
- Scheduling, text, images
- Separate from EHR, but may feed it or interact with it
- Support billing “eVisits” (Medicare)

Fully Integrated EHR

- All scheduling, communication, and texting within EHR
- Expensive & complex
Zoom Video (or Equivalent)

- Zoom Healthcare Account (includes 10 licenses and a BAA)
- Zoom “Pro” Account (1 license, no BAA) - can be used temporarily
- Zoom free account (1:1 or 40-min Gp)

Settings - log in at zoom.us to change
- Encryption is standard/default
- Disable recording
- Other optional settings
“eVisit” Platforms

Dozens of potential products exist. Lots of confusion and non-standard feature sets. Necessary features include:

- Patient portal (secure 2-way text communication)
- Image uploads
- Symptoms reporting/histories
- Signatures (informed consent)
- Scheduling
- (Optional) Live video calls

Encounters using these platforms are billable as “eVisits” for Medicare
Evaluating Platforms

Comparison Sites:
http://telehealthtechnology.org/toolkit/clinicians-guide-to-video-platforms/ (TTAC)
https://telementalhealthcomparisons.com/ (Jay Ostrowski)
https://vsee.com/telemedicine-platform-reviews (VSee)

No “Consumer Reports” comparison exists
Computers and Peripheral Equipment

End points

- Laptop, tablet, or cell phone (with built-in camera, mic, and speaker)
- Desktop (add USB webcam, mic, and speakers)
- Device stand (for cell phones/tablets)

(Optional Peripherals)

- Webcam - Logitech C920/922 (or similar)
- Speakerphone - Jabra Speak 410 (or similar)
- Headset - Mpow 071 USB Headset (or similar)
Network Connections

Participants at home may connect with:
Home Wi-Fi
Cellular Data

Charges for data may apply (make sure patients know this)

Quality of the network connections will determine the quality of the call!
Potential Technical Pain Points

Keeping encounters private (separate video products, only).
- Ensuring each client/patient has a secure (unique) link
- “Locking” rooms; using passwords
- Using virtual waiting rooms

Providing technical support to clients/patients who have difficulty.

Alternatives for patients with no cell phones, computers, or connectivity.
POLICIES

- Informed Consent
- Patient Appropriateness, Location & Safety
- Broken Calls
- Documentation
- Emergencies
Informed Consent

You must document patient consent for telehealth. It can be verbal (for now). Inform them:

Calls are not recorded.
If the call drops, try to reconnect, or call this number ______.
There are confidentiality risks; how to minimize them.
Connect from a quiet, private, safe place, with minimal distractions.
Only use approved software and links provided.
The patient portal and video are not an emergency contact method.
Patient Appropriateness

Document any concerns regarding the appropriateness of telehealth for this patient or at this time. Concerns may include:

- Difficulty using the equipment effectively
- Lack of access to adequate connectivity or private space
- Inability to collect necessary medical information from patient or perform an adequate exam
- History of or current difficulty managing patient behavior

**NOTE:** Clinical needs and/or urgency may outweigh concerns
Location & Safety

Every effort should be made to see patients in a safe, secure manner. Confirm the patient’s **identity** and **location** at the outset of every encounter. Collect local non-emergency numbers for fire, police, and patient contacts.

**If the patient is in an insecure or inappropriate setting, you may:**

- Agree to wait until they are appropriately situated
- Ask to reschedule for a better time
- Perform a brief check-in and plan for follow up

**Engage emergency procedures if appropriate**
Emergency Procedures

As part of the consent/initial session:

- Discuss emergency procedures and any foreseeable risks
- Collect numbers for local fire, police, and other emergency contacts

In an emergency situation:

- Maintain contact and work to transfer care to appropriate onsite responders and/or caregivers
- Document the event and the transfer of care
- Make any mandated reports
PROCEDURES

Scheduling & Room assignment
Opening Script
Presentation & Examination
Disposition & Follow up
Documentation
Scheduling & Room Assignment

Scheduling follows “normal” procedures as much as possible. Plus...

Each encounter is assigned a unique Meeting ID:

- “Host” (Provider) generates a Meeting ID (in a 2-hour “time range”)
- Meeting ID is placed on the schedule and sent to the patient as part of the appointment confirmation/reminder
- At meeting time, both patient and provider enter the Meeting ID room
- Once the meeting ends and the time elapses, the Meeting ID will automatically be deleted (Zoom)
- (Some patients may be given re-usable “recurring” meetings, if desired)
Opening Script

1. Hello [pt]. Can you see and hear me clearly? [Adjust for lighting, sound.]
2. As you know, I’m [Provider]. Can you confirm your name and date of birth for me, please?
3. Can you confirm your location, please?
4. Are you in a private place? Is anyone else in the room or within earshot?
5. Do you have any questions about the privacy of this call or anything else before we begin?
6. If we get disconnected, please reconnect using the same link. If that fails, I will call you at __________. Is that the correct number?
Presentation & Examination

- Use capability provided in the Patient Portal (separate product or through EHR) to collect symptom information and/or complaints
- Use functional questions or other non-contact techniques to assess medical conditions (assume no ability to physically examine the patient)
- Recognize when a physical examination is required for the condition or presentation, and make appropriate arrangements for an exam
- If decisions are made with inadequate information due to urgency, document these decisions and reasons

http://www.telemedmag.com/article/telemedicine-physical-better-think/
Disposition & Follow-up

- Record disposition, referrals, and plans as usual in the record
- Refer patients to appropriate staff (video link or phone number) for check-out and follow up
- Follow organizational policies regarding deferral of co-pays
  - Many payers are allowing for waived/reduced co-insurance/co-pays during emergency
Documentation

Document encounters as usual for the billing code, including ...

- Patient's location ("Home" is OK, as long as address is on file)
- Provider's location ("Clinic" or "Provider home, via secure clinic portal")
- That the encounter was conducted via telehealth
- Encounter start and stop times
- That the patient consented (unless clearly documented elsewhere)
- Any other people or providers involved, including any presenters

Optional...Provide a reason for using telehealth (medical or otherwise)
Billing

- Bill encounters using the same CPT codes as would apply in-person, respecting the same time and complexity guidelines as usual
- Add POS code “02” (Via Live Video) and Modifier “95” (or “GT” for Iowa)
- FQHC/RHC Medicaid reimbursement varies by state
  - Some FQHCs are entitled to a full PPS/Encounter rate for telehealth visits
- Most payers are now (temporarily) covering telehealth-specific codes, “virtual care” codes, and telephonic codes
- Reimbursement amounts for these codes are unclear, probably lower
- Monitor reimbursement and appeal denials as usual
Special coding advice during COVID-19 public health emergency

- The coding scenarios in this document are designed to apply best coding practices. The American Medical Association (AMA) is working to ensure that all payors are applying the greatest flexibility to our physicians in providing care to their patients during this public health crisis.

- The Centers for Medicare & Medicaid Services (CMS) lifted Medicare restrictions on the use of telehealth services during the COVID-19 emergency. Key changes include:
  - Effective March 6 and throughout the national public health emergency, Medicare will pay physicians for telehealth services at the same rate as in-person visits for all diagnoses, not just services related to COVID-19.
  - Patients can receive telehealth services in all areas of the country and in all settings, including at their home.
  - CMS will not enforce a requirement that patients have an established relationship with the physician providing telehealth.
  - Physicians can reduce or waive cost-sharing for telehealth visits.
  - Physicians licensed in one state can provide services to Medicare beneficiaries in another state. State licensure laws still apply.

- HHS Office for Civil Rights offers flexibility for telehealth via popular video chat applications, such as FaceTime or Skype, during the pandemic.

- AMA’s telemedicine quick guide has detailed information to support physicians and practices in expediting implementation of telemedicine.

- Disclaimer: Information provided by the AMA contained within this Guide is for medical coding guidance purposes only. It does not (i) supersede or replace the AMA’s Current Procedural Terminology® manual (“CPT Manual”) or other coding authority, (ii) constitute clinical advice, (iii) address or dictate payer coverage or reimbursement policy, and (iv) substitute for the professional judgement of the practitioner performing a procedure, who remains responsible for correct coding.

- To learn more about CPT licensing click here.

### Scenario 10 – (Non-COVID-19 case): Telehealth visit for a non-COVID-19 patient

| Action                  | Communication method | Patient assessed: E/M telehealth, telephone assessment  
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>(Flexibility: Permit audio only for E/M telehealth)</td>
</tr>
<tr>
<td>Who is performing</td>
<td></td>
<td>Physician / QHP</td>
</tr>
<tr>
<td>Applicable CPT Code(s)</td>
<td>Audio</td>
<td>New Patient: E/M Telehealth *</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Established Patient: E/M Telehealth OR Telephone Evaluation (independent of E/M) *</td>
</tr>
<tr>
<td></td>
<td>Audio/Video</td>
<td>99212 (typical time 10 min)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>99213 (typical time 15 min)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>99214 (typical time 25 min)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>99215 (typical time 40 min)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>99441 (5-10 min)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>99442 (11-20 min)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>99443 (21-30 min)</td>
</tr>
<tr>
<td>Applicable ICD-10 codes</td>
<td></td>
<td>Report relevant ICD-10 code(s) related to reason for call or online interaction</td>
</tr>
<tr>
<td>Place of Service</td>
<td></td>
<td>02 Telehealth</td>
</tr>
<tr>
<td>Notes</td>
<td></td>
<td>*Payors may require the use of Modifier 95 for telehealth services</td>
</tr>
</tbody>
</table>
Scenario 11 – (Non-COVID-19 case): Patient receives virtual check-in OR on-line visits via patient portal/e-mail (not related to E/M visit) OR telephone call from qualified nonphysician (those who may not report E/M)

<table>
<thead>
<tr>
<th>Action</th>
<th>Communication method</th>
<th>Patient evaluated</th>
</tr>
</thead>
<tbody>
<tr>
<td>Who is performing</td>
<td>Physician / QHP</td>
<td>Qualified nonphysician (may not report E/M)</td>
</tr>
<tr>
<td>Applicable CPT Code(s)</td>
<td>Virtual Check-Ins G2010 Remote Image G2012 Virtual Check-In</td>
<td>98966 (5-10 min) 98967 (11-20 min) 98968 (21-30 min)</td>
</tr>
<tr>
<td>Applicable ICD-10 codes</td>
<td>Report relevant ICD-10 code related to reason for call or online interaction</td>
<td></td>
</tr>
<tr>
<td>Place of Service</td>
<td>11 Physician Office or other applicable site of the practitioner’s normal office location</td>
<td></td>
</tr>
</tbody>
</table>

A virtual check-in pays professionals for brief (5-10 min) communications that mitigate the need for an in-person visit, whereas a visit furnished via Medicare telehealth is treated the same as an in-person visit.
Iowa Medicaid

March 11 Letter (#2115) - Complete list of billable codes
- Virtual Care Service Codes, RPM, eVisits (like Medicare)
  - Bill these with POS = 12 (Patient’s Home)
- Office E/M and Telephone E/M (like Medicare)
  - Standard (Office Visit) E/M uses POS = 02
  - Telephone E/M uses POS = 12 (Patient’s Home)

March 19 Letter (#2119) - Any covered service, any patient location
<table>
<thead>
<tr>
<th>TYPE OF SERVICE</th>
<th>WHAT IS THE SERVICE?</th>
<th>HCPCS/CPT CODE</th>
<th>Patient Relationship with Provider</th>
</tr>
</thead>
</table>
| **MEDICARE TELEHEALTH VISITS** | A visit with a provider that uses telecommunication systems between a provider and a patient. | **Common telehealth services include:**  
- 99201-99215 (Office or other outpatient visits)  
- G0425-G0427 (Telehealth consultations, emergency department or initial inpatient)  
- G0406-G0408 (Follow-up inpatient telehealth consultations furnished to beneficiaries in hospitals or SNFs)  
For a complete list: [https://www.cms.gov/Medicare/Medicare-General-Information/Telehealth/Telehealth-Codes](https://www.cms.gov/Medicare/Medicare-General-Information/Telehealth/Telehealth-Codes) | **For new* or established patients.**  
*To the extent the 1135 waiver requires an established relationship, HHS will not conduct audits to ensure that such a prior relationship existed for claims submitted during this public health emergency |
| **VIRTUAL CHECK-IN** | A brief (5-10 minutes) check in with your practitioner via telephone or other telecommunications 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. | **HCPCS code G2012**  
**HCPCS code G2010** | **New Pts OK**  
For established patients. |
| **E-VISITS** | A communication between a patient and their provider through an online patient portal. | **E/M Providers**  
- 99421  
- 99422  
- 99423  
- G2061  
- G2062  
- G2063  
**Other Providers**  
- 99421  
- 99422  
- 99423  
- G2061  
- G2062  
- G2063 | **Portal or Platform**  
For established patients. |
Medicare

- *Any originating (patient) site
- “Telehealth” = live video only
- Other “non-telehealth” services are allowed, including
  - Virtual Check-in (G2010/G2012)
  - eVisits (via Patient Portal)
    - 99421/2/3 and G2061/2/3
  - Remote Physiological Monitoring

*Temporarily

Medicaid

IA: All services, live video only
MN: Waiver pending, patient home OK
NE: Telephone E/M visits OK
ND: Out-of-state Licenses OK, insurance coverage mandated
SD: Expanded providers and sites
WI:
PRACTICE

PRACTICE, PRACTICE, PRACTICE

Take some time to gain familiarity and comfort with equipment and software before your first “real” telehealth encounter. Debrief and compare notes if things don’t go as planned, or you need to adjust things.

COMMUNICATE WITH COLLEAGUES AND WORK AS A TEAM
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