

ProviderAlert

To: Select Health of South Carolina Participating Licensed Independent Practitioners (LIPs) and Applied Behavioral Analysis (ABA) Providers

From: Select Health Provider Network Management

Date: April 27, 2020

Subject: Telephonic care provided by LIPs and ABA providers

The information provided herein is reflective of the applicable South Carolina Department of Health and Human Services (SCDHHS) guidance at the time of issuance. Providers should continue to check the SCDHHS COVID-19 website at: <https://msp.scdhhs.gov/covid19/> for further updates and modifications to practice and billing requirements given the evolving situation surrounding this pandemic.

To help ensure continuity of care within patient-provider relationships and in accordance with SCDHHS guidance, Select Health licensed psychologists and other LIP providers (LPC, LPC-S, LMFT, LMFT-S, LISW-CP, LISW-AP, and LPES) will be allowed to conduct telephonic periodic check-ins and assessments and telehealth video conferences with new and established patients.

During the COVID-19 public health emergency and response, the ability to provide telemedicine services will also be extended to associate-level practitioners, individuals who have met the educational and testing requirements to be licensed for a profession, but have not met the experience hours or case requirements for full licensure. During the period of associate licensure, associates practice with limited supervision under the guidance of a fully licensed supervising professional, who is responsible for the associate's professional activities during the period of limited licensure. The following associate types may render services and receive reimbursement under the registration of their supervising providers:

- Licensed Professional Counselor - Associates
- Licensed Marriage and Family Therapist - Associates
- Licensed Master Social Workers
- Psychologist - Postdoctoral Pending Licensure

Billable telephonic care codes for LIPs (during the COVID-19 health emergency):

Code	Description
98966	Telephonic Assess/Mgmt; 5-10 minutes, non-physician
98967	Telephonic Assess/Mgmt; 11-20 minutes, non-physician
98968	Telephonic Assess/Mgmt; 21-30 minutes, non-physician

- Telephonic care codes should not be billed if the telephonic encounter originates from a related assessment and management service provided within the preceding seven days or if it leads to an assessment and management service or procedure within the subsequent 24 hours.
- For Select Health, use the standard modifiers (AH, HO) as the first modifier, and use the 'GT' as the second modifier when billing these codes.
- A total of three encounters will be allowed every 30 days, and services may be provided regardless of the Medicaid member's location.
- Telephonic crisis management continues to be available through the community mental health, LIPs, and rehabilitative behavioral health services benefits. The three encounter limitation does not apply to crisis management
- Notification and medical necessity requirements related to the provision of crisis management continue to apply.

Since schools will remain closed for the remainder of the school year and in support of the state's intensifying social distancing efforts, additional telemedicine codes for providers enrolled under Community Mental Health Clinics (CMHC), Rehabilitative Behavioral Health Services (RBHS) or LIP categories are being allowed.

Billable telemedicine codes for CMHC, RBHS and LIPs (during the COVID-19 health emergency):

Code	Description	Limitation
90832	Individual Psychotherapy, 30 Minutes	1/day, 6/month
90834	Individual Psychotherapy, 45 Minutes	1/day, 6/month
90837	Individual Psychotherapy, 60 minutes	1/day, 6/month
90846	Family Psychotherapy, without client, 50 minutes	1/day, 4/month
90847	Family Psychotherapy, Including Client, 50 minutes	1/day, 4/month
90791	Psychiatric Diagnostic Evaluation without Medical	1 per 6 months
H2014	Behavior Modification	4 units/day
H2017	Psychosocial Rehabilitation Service (individual)	4 units/day
S9482	Family Support	4 units/day

Note: These limitations and billing guidelines apply only when these services are provided via telehealth.

- The services and limitations listed may be delivered without regard to the patient's location.
- Initial guidance for provision of these telehealth services was limited to established patients only. Effective April 16, 2020, these codes are reimbursable to new and established patients. Standards for authorization, referral, service limits and standards of medical necessity must be satisfied prior to initiation of care for a new patient.
- A synchronous audio-visual, telehealth delivery platform must be used.
- Use the current modifiers (AH, HO) as the first modifier, and use the 'GT' as the second modifier to indicate services are being rendered via telehealth.
- Providers engaging in telemedicine services are required to ensure that the quality of care delivered is the same as if engaging the patient in a face-to-face format.
- Only individual services are eligible for telemedicine. Group or multi-family interventions are not reimbursable, nor are services with staff-to-member ratio less than one-to-one.
- Providers may not conduct interventions remotely with more than one individual concurrently and must conclude any intervention or visit with one patient before commencing an intervention or visit with the next.
- Providers must still follow the course of therapy and limitations detailed in the member's individual plan of care (IPOC).
- Since services are not being conducted face-to-face, signature requirements for service plan development (SPD), IPOCs and written consents for treatment are being waived.
- In lieu of the wet-ink signature, providers must document verbal consent for treatment of all parties present during the telephone/video conference and include a time stamp.

Applied Behavior Analysis (ABA)

ABA is a broad discipline that is closely associated with its intensive application to treat individuals diagnosed with autism spectrum disorder (ASD). In order to support social distancing while maintaining the clinical appropriateness of the provision of ABA, Select Health is following the temporary telemedicine guidelines set forth by SCDHHS to help ensure clinically relevant services are reimbursed. In instances where families and providers elect to engage in continued face-to-face adaptive behavior treatment by protocol (CPT code 97153), via telehealth, we will:

- authorize synchronous audio/visual supervision of Registered Behavior Technicians (RBTs) and other therapists using telemedicine.
- allow for the reimbursement of remote consultation by supervisory providers and supervision of parents providing ABA in a limited capacity in those instances where families elect to decline face-to-face therapy.

Billable ABA **Remote Supervision** telemedicine codes (during the COVID-19 health emergency):

Code	Description	Limitation
97151	Behavior Identification Assessment	32 units annually
97155*	Adaptive Behavior Treatment with Protocol Mod	10% of authorized weekly line therapy hours (97153)
97156	Family Adaptive Behavior Treatment Guidance	48 units annually

* Only reimbursable if family continues to receive face-to-face adaptive behavior treatment by protocol (CPT code 97153).

- The codes above should be billed using the 'GT' modifier.
- Services provided via telemedicine are to be reimbursed in lieu of, not in addition to, those provided face-to-face.
- In order to help ensure continuity of care, SCDHHS is also authorizing assessments of established patients so that plans of care can remain current and relevant for members.

If families choose not to engage in face-to-face interaction with an RBT or other therapist, SCDHHS is authorizing reimbursement for consultation by providers authorized to practice independently, when therapy is provided through a parent or family member.

- Available only to families and members who have elected to discontinue otherwise authorized face-to-face, RBT-directed treatments and the related services.
- Cannot be billed intermittently or concurrently with ABA therapies otherwise meeting the standards of the State Plan or relevant provider manuals.

Billable ***Consultation of Parent-Directed Activities*** telemedicine codes (during the COVID-19 health emergency):

Code	Description	Limitation
97151	Behavior Identification Assessment	32 units annually
97155*	Adaptive Behavior Treatment with Protocol Mod	10% of authorized weekly line therapy hours (97153)
97156	Family Adaptive Behavior Treatment Guidance	48 units annually

* May be provided at a ratio of those authorized by the member’s individual plan of care (IPOC)

- The codes above should be billed using the ‘CR’ modifier.
- To be reimbursed in lieu of, not in addition to, those provided face-to-face.
- Does not apply to services provided and reimbursed in a manner consistent with standard SCDHHS policies and procedures.

Prior authorizations:

For services that normally require prior authorization, Select Health will continue to review for medical necessity, exercising discretionary flexibility warranted by the current COVID-19 public health emergency.

Providers should continue to submit prior authorization requests by completing the applicable form found on the Select Health website, www.selecthealthofsc.com/provider/resources/forms.aspx, through the NaviNet provider portal or by calling Behavioral Health Utilization Management at **1-866-341-8765**. Current authorizations that are scheduled to expire will be reviewed for possible extension upon request for the duration of the COVID-19 health emergency.

Authorization for members in Foster Care:

During the COVID -19 pandemic, medical necessity reviews will be waived for behavioral health services for children in foster care. However, notification of the services to be rendered is still required by calling Behavioral Health Utilization Management at **1-866-341-8765**.

Members who are unable to self-direct or engage with a telephone or audio-visual device without a provider's presence may require face-to-face interactions to receive the therapeutic effect of the interventions.

When services are provided in a manner consistent with standard SCDHHS policy, such as care delivered face-to-face or through the therapeutic foster care system, existing limitations and billing requirements apply.

General information

Several exclusions remain in place during the COVID-19 response to help ensure that Medicaid reimbursement is available only when the quality of patient care remains at a clinically appropriate level and may not be provided via telemedicine, including:

- Administration of injectable medication.
- Inpatient services administered in a hospital inpatient psychiatric setting or Psychiatric Residential Treatment Facility (PRTF) cannot be provided in alternate settings and monitored remotely.
- Services provided by providers who are not licensed or credentialed to practice independently are also excluded (unless otherwise noted).

Families and members should be given every opportunity to make informed decisions about the receipt of services via telemedicine, including the clinical appropriateness of the intervention, its limitations, privacy and confidentiality, and the effect the provider's setting has on each of these issues.

Reimbursement for the telephonic services is available if the interaction with the member includes telephone and/or video components. Other forms of electronic communication, such as email and instant and text messaging, are not eligible for reimbursement.

For all telemedicine services, the audio and visual components of the interaction must include sufficient quality and/or resolution for the provider to effectively deliver the care being administered.

SCDHHS has also published the fee schedule for telehealth codes that have been created during the public health emergency and further guidance for providers through a newly launched COVID-19 frequently asked questions (FAQs) page. Both resources are available on the Agency's COVID-19 website; the fee schedule is located at: www.scdhhs.gov/resource/fee-schedules and the FAQ page can be found at: <https://msp.scdhhs.gov/covid19/faq-resources>. Additional questions or concerns may be submitted to SCDHHS by emailing: covid@scdhhs.gov.

Thank you for your cooperation during this challenging time and for the valuable services you provide our First Choice members.