



E-Visits During COVID 19

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## Good News for Friday

- UHC Expanded their Policy for Telehealth Coverage for Therapy
- https://www.uhcprovider.com/en/resourcelibrary/news/Novel-Coronavirus-COVID-19/covid19telehealth-services/covid19-telehealth-pt-ot-st.html
- Codes Covered
  - PT Evals & Re-evals Plus
    - 97110, 97116, 97530, 97112, 97535
  - OT Evals & Re-evals Plus
    - 97110, 97530, 97112, 97535
  - Speech
    - 92507, 92521, 92522, 95523, 92526, 96105, 97129, 97130
- https://www.uhcprovider.com/content/provider/en/viewer. html?file=%2Fcontent%2Fdam%2Fprovider%2Fdocs%2Fpu blic%2Fresources%2Fnews%2F2020%2FCOVID19-Telehealth-Services-PT-OT-ST.pdf



## More Wins



- CIGNA is covering telehealth and is transmitting that information to ASH and RPN
  - 97110 limit of 2 units
  - Low and Moderate complexity evaluations
- Don't forget Tricare and Triwest



Cares Act

CARES Act passed the US Senate and House Today and signed by the President

- Lifts the 2% sequestration reduction in Medicare payments 5/1/-12/31/2020
- Opens the door for Medicare expansion of Telehealth- still requires HHS Secretary to waive the restrictions specifically for physical therapists
- Defers Student Loan Payments through September 30, 2020

## Recovery Rebates for Individuals included in the Cares Act

- \$1,200 (single)
- \$2,400 (married)
- \$500/child
- US Resident with Adjusted gross income up to \$75,000 (\$150,000 married).

## Cares Act Payment Protection Loans (Section 1102)

- Eligibility: < 500 employees
- Amount: 2.5 x avg monthly payroll (including bonuses, insurance premiums, retirement contributions and taxes) up to \$10M
- No collateral, personal guarantees, etc
- Will be administered by local banks-make those calls and find out who will be participating
- Max interest rate 4%-no fees

## Cares Act Loan Forgiveness & Delay In Payroll Taxes

- Loan Forgiveness (Section 1106)
  - The amount of the loan above that you spend in the 8 weeks following initiation of the loan on payroll costs, rent, utilities, internet, telephone and interest expense will be forgiven in full assuming:
    - You are paying the same amount of people (you used in your payroll calculation) the same amount of wages
    - If not, the amount that will be forgiven will be proportional to the reductions
- Delay in payroll taxes (Section 2302)
  - Defer payment of SS tax (pay 50% in 2021 and 50% in 2022)
  - Not huge but nice



## E-Visits ARE NOT

## Telehealth

Telerehab

A true substitute for therapy

### E-Visits ARE

A pathway to keep in touch with your patients

A pathway for them to get answers to their questions

Better than nothing



## Define An E-Visit

- Established patient
- Non face to face
- Patient initiated
- Digital communications
- That REQUIRE a clinical decision
- That otherwise typically would have been provided in the office
- Short term assessment and management activities
- Conducted online or via some other digital platform

## Online Patient Portal

- Secure online website
- Gives patients convenient, 24 hour access to PHI from anywhere with an internet connection
- Requires a secure username and password
- Example: EPIC's My Chart





## What If I Don't Have A Portal

- CMS has IMPLIED that they are giving providers flexibility in the platform used
- If you have adopted a telehealth platform, then that might be your best option even though an e-visit is not telehealth
- Call your MAC if you want to make sure

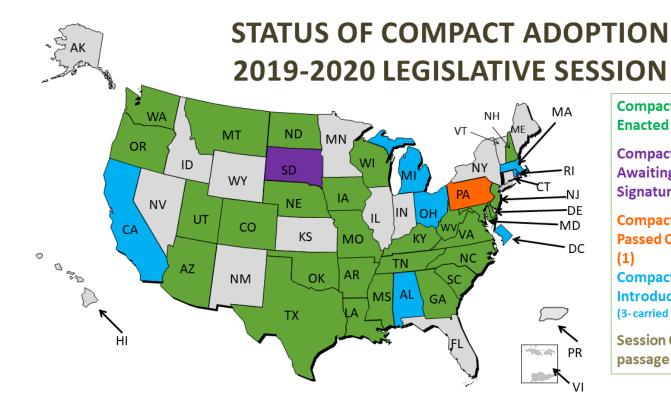


## Who Can Perform An E-Visit?

- The word assessment is used in the code
- Must be provided by a clinician
- PT/OT/SLP

### Licensure

- Licensed in the state where the patient is
- Check for licensure laws if the patient is located in another state
- Some states are
   dropping their
   requirements at this
   time so that therapists
   can cross state lines and
   treat.
- Compact license



Compact Legislation Enacted (27)

Compact Legislation Awaiting Governor Signature (1)

Compact Legislation
Passed One Chamber
(1)

Compact Legislation Introduced (7)

(3-carried over from 2019)

Session Closed without passage (0)

## Billing G Codes

## March 17 Medicare Publication – E-Visits

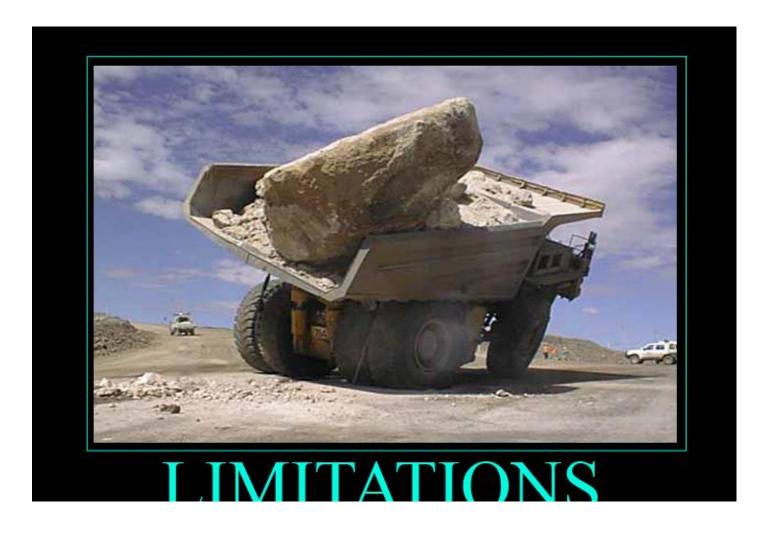
G2061: Qualified non-physician healthcare professional online assessment and management, for an established patient, for up to seven days, cumulative time during the 7 days; 5–10 minutes

G2062: Qualified non-physician healthcare professional online assessment and management service, for an established patient, for up to seven days, cumulative time during the 7 days; 11–20 minutes

G2063: Qualified non-physician qualified healthcare professional assessment and management service, for an established patient, for up to seven days, cumulative time during the 7 days; 21 or more minutes.

	TYPE OF SERVICE	WHAT IS THE SERVICE?	HCPCS/CPT CODE	Patient Relationship with Provider
Not Covered for PT	MEDICARE TELEHEALTH VISITS	A visit with a provider that uses telecommunication systems between a provider and a patient.	<ul> <li>Common telehealth services include:</li> <li>99201-99215 (Office or other outpatient visits)</li> <li>G0425-G0427 (Telehealth consultations, emergency department or initial inpatient)</li> <li>G0406-G0408 (Follow-up inpatient telehealth consultations furnished to beneficiaries in hospitals or SNFs)</li> <li>For a complete list:         <ul> <li>https://www.cms.gov/Medicare/Medicare-General-Information/Telehealth/Telehealth-Codes</li> </ul> </li> </ul>	*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	For established patients.
Covered for PT	E-VISITS	A communication between a patient and their provider through an online patient portal.	<ul> <li>99431</li> <li>99422</li> <li>99423</li> <li>G2061</li> <li>G2062</li> <li>G2063</li> </ul>	For established patients.

## Billing Limitations



- Cumulative time in a 7 day period
- Highest paying code is 21+ minutes
- Clock starts with the first e-visit and ends after 7 days.
- Only 1 code per 7 days
- No face to face visits 7 days before the e-visit and 7 days after the evisit
- Can I bill more than one per episode of care?
  - Ask your MAC
  - Noridian told one provider yes

### Other Limitations

- Patient MUST initiate
- You can inform the patient of this option and give them the mechanism to initiate the e-visit
- Not a TRUE Telehealth Visit if you do those, perform them as a cash-based visit.



## Other Questions

- Does an e-visit have to be in my POC?
  - No
- Does an e-visit count towards my 10 visit
   Progress Note Requirement
  - No
- How Do I document?
  - Admin Note
  - Document why this is an e-visit vs a regular visit
  - Document that the patient initiated the e-visit and consented and the reason they initiated the visit.
  - Note what was done and make sure it shows clinical decision making

## One More Billing Piece



- Bill as Place of Service Code 11
- Bill with a CR modifier
- Bill with a DR modifier as a condition code and a CR modifier if you are a facility (Part A) provider
- Medicare coinsurance/deductibles apply
- We do not know how secondaries will process these.

## Other Payers

- E-visits don't apply to authorized visits it's not really a visit.
- Aetna is using the G codes

## Billing Other Codes

## Billing and Coding

- Codes 99421, 99422 and 99423 are E/M codes for physicians
- 99 Codes are not for you!



# 98 Codes. ONLY USE THESE IF DIRECTED BY PAYER

#### Nonphysician Telephone Services

#### Includes

- Assessment and management services provided by telephone by a qualified health care professional
- Initiated by an **established** patient or his/her guardian

#### Excludes

- Call initiated by the QHP Meaning Patient has to Initiate
- Decision to see the patient with 24 hours of the call
- Telephone services that are considered a part of a previous or subsequent services – 7 days prior or 24 hours after

## 98 Codes

#### 98966

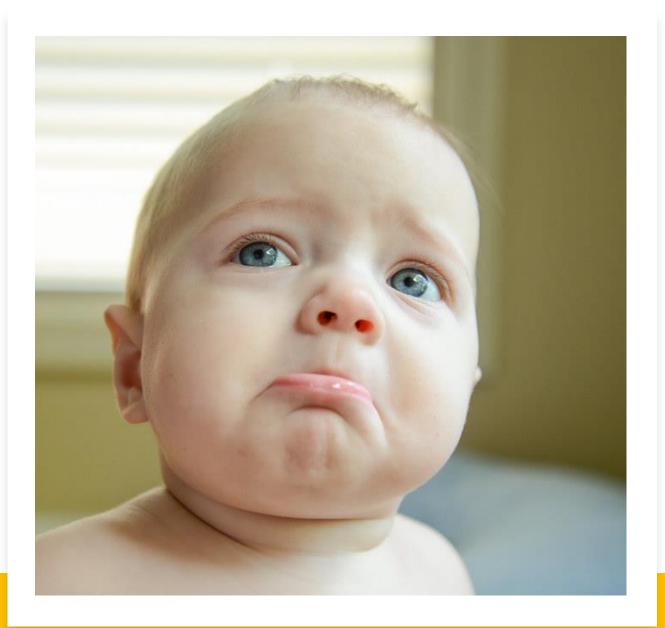
- Telephone assessment and management service provided by a QHP (nonphysician) to an established patient, parent or guardian not originating from a related assessment and management services provided within the previous 7 days nor leading to an assessment and management services or procedure within the next 24 hours or soonest available appt;
- 5-10 minutes of medical discussion

#### 98967

• 11-20 minutes

#### 98968

• 23-30 minutes



## Questions I Don't Have Answers To:

- Can you do these every 7 days?
- What will they pay?
- Can a PTA perform?
- Can you bill more than one of these codes when going over the highest code minute number?

## Commercial Insurer Example

- BCBS SC
- https://web.southcarolinablu es.com/providers/providerne ws/providernewsarchives/20 20providernews.aspx?article id=1216

- 14. Can physical therapists, occupational therapists, and speech therapists file for telephone visits?
  Yes, we will accept claims for physical therapy, occupational therapy, and speech therapy, using the following codes:
- 98966: Telephonic Assessment and Management services provided by a qualified non-physician health care professional to an established patient; 5-10 minutes of medical discussion
- 98967: Telephonic Assessment and Management services provided by a qualified non-physician health care professional to an established patient; 11-20 minutes of medical discussion
- 98968: Telephonic Assessment and Management services provided by a qualified non-physician health care professional to an established patient; 21-30 minutes of medical discussion

## The Other 98 Codes

- 98970
  - Qualified nonphysician health care professional online digital evaluation and management service, for an established patient, for up to 7 days, cumulative time during the 7 days; 5-10 minutes
- 98971
  - 11-20 minutes
- 98972
  - 21 or more minutes
- These are just like the Medicare G codes –
   same information just different codes.

