

Telehealth Billing and Reimbursement Questions

1. Will Medicare reimburse for a telehealth encounter originating from an Assisted Living Facility?

Medicaid: N/A

Medicare: Eligible originating sites for Medicare telehealth are the office of a physician or practitioner, hospitals, critical access hospitals (CAH), rural health clinics, federally qualified health centers, hospital-based or CAH-based renal dialysis centers (including satellites), skilled nursing facilities, and community mental health centers.

Cigna: Yes, Calls can originate from anywhere.

2. We are FQHC clinic with 4 sites. Can we bill and how would we bill if patient at one clinic needs a telehealth visit with mental health provider at another clinic?

Medicaid: As long as you are enrolled as separate clinics it would be appropriate to bill for the Telehealth visit. If you are enrolled as a single clinic then the system will not allow you to be both the Spoke and the distant site.

Medicare: FQHCs are not authorized under the statute as eligible distant sites. They are on the list of eligible originating sites.

Cigna: That would not work with Cigna. Our telehealth providers would be contacted through our website services.

3. Do the payors reimburse for acute/emergent telehealth, such as telestroke, with an originating site in an ED?

Medicaid: Not at this time.

Medicare: Section 50325 of the Bipartisan Budget Act of 2018 amends Section 1834(m) of the Social Security Act to remove the originating site type requirements and geographic restrictions for telehealth services furnished on or after January 1, 2019, for purposes of diagnosis, evaluation, or treatment of symptoms of an acute stroke. It also adds mobile stroke units as eligible originating sites.

Cigna: No. Cigna Telehealth services are PCP type services.

4. I am getting the impression that Cigna provides the healthcare professional for their Telehealth coverage. Does Cigna pay for any Wyoming provider to provide the service?

Medicaid: N/A

Medicare: N/A

Cigna: Yes, they just register with MD Live or AM Well. There are a lot of providers in Wyoming.

5. Do the payors reimburse for allied telehealth including speech-language pathology, physical therapy, occupational therapy, or pharmacy medication management?

Medicaid: At this time, we do not have these services open, however if you would like to request that additional services we would certainly review the request.

Medicare: Medicare does not have the statutory authority to cover these services.

Cigna: Cigna's providers at this time are PCP and BH.

6. If a hospital is paying an hourly rate for physician coverage via telehealth and that physician evaluates and diagnoses an admitting patient, can the hospital bill Medicaid for the visit? The rules indicate only the provider can bill, not the hospital?

Medicaid: Wyoming Medicaid does not reimburse for this service.

Medicare: N/A—I believe you would need to reach out to your state's Medicaid office. There is great variability between states.

Cigna: Cigna telehealth providers cannot admit to the hospital. If it is urgent/emergent, the member will be sent to the emergency room.

7. For Cigna again. Our office is looking to provide an entire clinic as a replacement for an outreach clinic. It would be a specialist who would see a variety of patients at scheduled times in an office setting with video exchanges. Is that something that Cigna is going to cover?

Medicaid: N/A

Medicare: N/A

Cigna: The group needs to call and speak to contracting. The codes that will be billed need to be reviewed.

8. For Cigna. I just checked MDLive and AmWell to enroll. They do not accept nurse practitioners for enrollment. As a PCP, this is a barrier for my patients not to be able to use my services in a telehealth setting.

Medicaid: N/A

Medicare: N/A

Cigna: I can discuss NP enrollment with our leadership. At this time, only MDs can participate with MDLive and AMWell.

9. Do those that cover the CCM, cover G0506? The initiating visit?

Medicaid: Wyoming Medicaid does not cover CCM.

Medicare: Medicare makes separate payment for HCPCS code G0506. It is on the Medicare telehealth list and can be furnished via telehealth when all other requirements under section 1834(m) are met.

Cigna: Cigna does not cover G0506. Our CCM reimbursement is in line with our PCMH program.

10. Can an agency bill as BOTH the distance site and originating site? We offer a telehealth clinic with the client in our office with connection to a provider who is in another location. We do the billing under contract.

Medicaid: No.

Medicare: Only Critical Access Hospitals can bill as both a distant site and an originating site for a Medicare telehealth service.

Cigna: No. Cigna's telehealth program does not involve an originating site, so this does not apply.

11. If a patient is in the ER and they require an Infectious Diseases consult, if the patient is available to the ID doctor, will that be a covered telehealth service? Would there be any other requirements?

Medicaid: Wyoming Medicaid does not cover Telehealth in the ER at this time.

Medicare: Provided that all of the Medicare telehealth requirements are met and the code describing the service is on the Medicare telehealth list, then yes.

Cigna: Cigna's telehealth providers are PCP, not specialists.

12. We are starting a genetics telehealth clinic and will be the origination site. The doctors are in Salt Lake City but are licensed as WY providers. They are under contract for reimbursement but how do we bill or can we bill for the nurses who do the vital signs, height, weight, head circumference? Nurses will also be present to carry out any additional services the provider may need. In WY we do not have any geneticist and the current wait time to be seen at the Colorado clinics are approx 8-12 months.

Medicaid: Wyoming Medicaid does not cover services provided by an RN or LPN. IF the nurse was a NP they may be able to bill for services if they meet the minimum for an office visit.

Medicare: Under the Medicare Physician Fee Schedule, payment rates for physician/practitioner services (billed by the distant site) account for the resource costs of

clinical labor in the valuation of the service. Specifically, they are included within the practice expense relative value units. The originating site may bill for the originating site facility fee using HCPCS code Q3014. This fee accounts for the resource costs associated with serving as an originating site for Medicare telehealth. Additionally, CPT code 99211 describes an office or other outpatient visit for the evaluation and management of an established patient that may not require the presence of a physician or other qualified health care professional. Usually, the presenting problem(s) are minimal.)

Cigna: Please call the Cigna contractor to discuss how this would be set up. It would not be a service under the telehealth as it is now defined. 307.274.9109.