



CONFIDENTIAL

Independent Health Telehealth Services Coverage under COVID-19 State and Federal States of Emergency

Document Updated: July 20, 2022

This document will be updated regularly in accordance with changing regulatory guidance. Please reference this grid regularly to ensure up-to-date benefit information

Self-Funded and Nova Product benefits may vary by employer group.

Physician and Advanced Practitioner services apply for Primary Care Providers and Specialty Care Providers

For the purpose of this document please reference the following definitions:

Telehealth: Delivery of any healthcare service via electronic means (telemedicine, e-visit, telephone, etc.)

Telemedicine: Delivery of any healthcare service via synchronous two-way audiovisual technology

The coverage information within this document supersedes that within the Telehealth Services policy, although the policy can be used for additional billing information.

Services are billable when providers reach back out to a member as their availability allows.

Providers may schedule visits to occur via Telehealth technologies during the State of Emergency.

Although Emergency Regulations have opened coverage to services that may be delivered via telehealth, services which would otherwise be impossible (ex. J-codes, lab codes) will be denied.

Providers may render services via non-HIPAA compliant technologies such as FaceTime or Skype as permitted by the Department of Health and Human Services Office for Civil Rights.

Effective Date of Telehealth Benefit Changes below (DOS): January 1, 2022 through the end of Emergency Regulations

IMPORTANT NOTE: As previously communicated, when a telehealth evaluation results in an order for a Covid-19 test, or to evaluate an individual for purposes of determining the need for Covid-19 testing, Modifier CS must be appended to the claim line. This continues to be applicable to all lines of business. The use of Modifier CS drives waiver of member liability in accordance with the chart below. Failure to append Modifier CS appropriately will result in incorrect claim processing.

UPDATE: Independent Health continues to closely monitor the finalized New York State Budget which contained telehealth provisions. Although Independent Health cannot guarantee what will remain permanent coverage at this time, we want to communicate to our provider network that we will not return POS 02 and POS 10 to the Facility rates for April 1, 2022 as previously communicated while we await for the final NYS Budget instructions; we will revisit this determination once we receive final guidance from the State. This pause applies to all lines of business. Additionally, it is expected that in 2022 some or all of the Covid-19 Telehealth waivers will expire with much of the expanded coverage becoming permanent under health plan coverage. Independent Health will adhere to mandated coverage at a minimum and intends to continue to promote and provide equitable access to Telehealth services within bounds of State and Federal law. Please note that there could be exceptions on individual Self-Funded plans based on group level coverage, but when possible, Independent Health will provide advance notification. Once final determinations have been made on the reimbursement rate for POS 02 and POS 10, Independent Health will provide advanced notification to our provider community including the future effective date.

For reference, below is the originally communicated 2022 Telehealth changes which are still subject to change based on regulation:

ON HOLD UNTIL FURTHER NOTICE: Effective 4/1/2022 telehealth will return to the reimbursement methodology that was in place prior to the public health emergency. POS 02 will return to reimbursing at the Facility rate instead of the Non-Facility rate on your fee schedule. This will also be applicable to the new telehealth POS 10. Coverage largely remains unchanged for 2022, but some minor changes can be found in the chart below.

Effective January 1, 2022, POS 02 has been redefined as Telehealth Provided Other than in Patient's Home

Effective January 1, 2022 a new telehealth place of service has been published. POS 10 is defined as Telehealth Provided in Patient's Home.

Independent Health is not currently making changes to telehealth billing requirements as outlined in this COVID-19 telehealth billing tip sheets until further State and Federal regulations regarding POS 10 are released. Providers may bill using POS 10 beginning January 1st but would not be required to do so.

Service	Method/Code	Provider Type	New vs Est Patient	Coverage	Member Liability
Telemedicine: Synchronous, Two-Way Audio-Visual Technology	Various codes based on FS POS 02 or POS 10 Modifier GT or 95 Please see Telehealth Services Policy. Reimbursed at the current fee schedule rate.	Various provider types including Physicians, APPs, Audiologist, CSW, Physical Therapist, Dietitian (independent billing providers)	Commercial: Both Medicare: Both State: Both Self-Funded: Both	Yes	Commercial and Essential Plan Program 1: Liability applies when service is not for Covid-19 test orders. When the visit is to evaluate an individual for the purpose of determining the need for Covid-19 testing there is no liability. Medicare Advantage: Liability applies Other State Programs: No member liability Self-Funded and Nova Products vary by employer group.
Telephone: Audio-Only delivery of E/M service	Telephone (99441-99443) POS 02 or POS 10 No Modifier Required	Physician, Nurse Practitioner, Physician Assistant, Certified Nurse Midwives	Commercial: Both Medicare: Both State: Both Self-Funded: Both	Yes	Commercial and Essential Plan Program 1: Liability applies when service is not for Covid-19 test orders. When the visit is to evaluate an individual for the purpose of determining the need for Covid-19 testing there is no liability. Medicare Advantage: Liability applies Other State Programs: No member liability Self-Funded and Nova Products vary by employer group.
Telephone: Audio-Only delivery of service by non-physician/APP professional	Bill code from your FS that best describes the service POS 02 or POS 10 Modifier GQ Reimbursed at the current fee schedule rate.	Ex. Audiologist, CSW, Physical Therapist, Psychologist, Dietician (independent billing provider)	Commercial: Both Medicare: Both State: Both Self-Funded: Both	Yes	Commercial, Essential Plan Program 1 and Medicare Advantage Plans: Member liability applies Other State Programs: No member liability Self-Funded and Nova Products vary by employer group.
Registered Nurse Only Telephone Visit (billable under the Supervising Provider NPI, when only the RN performs the telephone visit)	99211 POS 02 or POS 10 Modifier GQ Required Reimbursed at the current fee schedule rate.	Registered Nurse	Commercial: Both Medicare: Both State: Both Self-Funded: Both	Yes	Commercial and Essential Plan Program 1: Liability applies when service is not for Covid-19 test orders. When the visit is to evaluate an individual for the purpose of determining the need for Covid-19 testing there is no liability. Medicare Advantage: Liability applies Other State Programs: No member liability Self-Funded and Nova Products vary by employer group.

Service	Method/Code	Provider Type	New vs Est Patient	Coverage	Member Liability
Virtual Check-In: Patient initiated check-in to see if visit or other svc is required	G2010, G2012, G2250 POS 02 or POS 10 No Modifier Required	Physician, Nurse Practitioner, Physician Assistant, Certified Nurse Midwives	Commercial: Both Medicare: Both State: N/A Self-Funded: Both	Yes except for State Programs	Commercial: Liability applies when service is not for Covid-19 test orders. When the visit is to evaluate an individual for the purpose of determining the need for Covid-19 testing there is no liability. Medicare Advantage: Liability applies Self-Funded and Nova Products vary by employer group.
Virtual Check-In: Patient initiated check-in (non-phys prof) to see if visit or other svc is required	G2251, G2252 POS 02 or POS 10 No Modifier Required	Ex. Physical Therapy, CSW, Psychologist (independent billing provider)	Commercial: Both Medicare: Both State: N/A Self-Funded: Both	Yes except for State Programs	Commercial: Liability applies when service is not for Covid-19 test orders. When the visit is to evaluate an individual for the purpose of determining the need for Covid-19 testing there is no liability. Medicare Advantage: Liability applies Self-Funded and Nova Products vary by employer group.
E-Visit: Digital care by online patient portal, email, patient initiated	99421-99423 POS 02 or POS 10 No Modifier Required	Physician, Nurse Practitioner, Physician Assistant, Certified Nurse Midwives	Commercial: Both Medicare: Both State: Both Self-Funded: Both	Yes except for State Programs	Commercial: Liability applies when service is not for Covid-19 test orders. When the visit is to evaluate an individual for the purpose of determining the need for Covid-19 testing there is no liability. Medicare Advantage: Liability applies Self-Funded and Nova Products vary by employer group.
Interprofessional Consultations	99446-99452 POS 02 or POS 10 No Modifier Required	Physician, Nurse Practitioner, Physician Assistant, Certified Nurse Midwives	Commercial: Both Medicare: Both State: N/A Self-Funded: Both	Yes except for State Programs	Commercial: Liability applies when service is not for Covid-19 test orders. When the visit is to evaluate an individual for the purpose of determining the need for Covid-19 testing there is no liability. Medicare Advantage: Liability applies Self-Funded and Nova Products vary by employer group.