

Coding Policy

Temporary Policy Emergency Provisions for: Telemedicine Services During COVID-19 Public Health Emergency for Medicare Plans

CODING POLICY NUMBER: 67.A

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SCOPE: Providence Health Plan, Providence Health Assurance, Providence Plan Partners, and Ayin Health Solutions as applicable (referred to individually as “Company” and collectively as “Companies”). **The full Company portfolio of current coding policies is available online and can be [accessed here](#).**

POLICY APPLICATION

- Providence Health Plan Participating Providers Non-Participating Practitioners
 Commercial Medicaid/Oregon Health Plan Medicare

POLICY STATEMENT

Note: There are temporary provisions in place for this Medicare medical policy during the COVID-19 public health emergency. See the [Procedure](#) section below for information regarding these emergency provisions.

- I. This policy (67.0.A) “Telehealth Services During COVID-19 Public Health Emergency for Medicare Plans” **APPLIES ONLY TO TELEHEALTH SERVICES FOR MEDICARE LINES OF BUSINESS FOR SERVICES DURING THE COVID-19 PUBLIC HEALTH EMERGENCY (PHE)**. For two-way video visits prior to March 1, 2020, providers are referred to Providence

Health Plan Coding Policy 67.0 (Telehealth Services Requiring an Originating Site), which is available on ProvLink.

- II. The Office for Civil Rights at the Department of Health and Human Services (HHS) temporarily waived the requirement for HIPAA-compliant connections for two-way video services “..in connection with the good faith provision of telehealth during the COVID-19 nationwide public health emergency.” (<https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html>) For dates of service on or before May 11, 2023, codes listed on this policy may be paid for telehealth services where the patient and/or provider is calling from a personal device. No contract amendment or attestation is required. **The Office for Civil Rights at the Department of HHS requires all telehealth platforms to be HIPAA-compliant beginning the day after the end of the PHE on May 11, 2023. Smart phone video options such as FaceTime and Skype will no longer be an option for telehealth services beginning May 12, 2023, based on these requirements.**
- III. Telecommunication services are services delivered via an electronic two-way communication system. Company provides coverage for telecommunication services when the service is medically necessary and supported by evidence-based medical criteria. Coverage for telecommunication services includes payment for consultations, office visits, individual psychotherapy, and pharmacologic management. All providers (including chiropractors and naturopaths) who are credentialed with Company and who are performing services within their scope of license may perform telecommunication services listed on this policy. Telecommunication services may not be billed as “incident to.”
- IV. Effective March 1, 2020, and until further notice, Company will allow payment for medically appropriate services identified on [List A](#) when performed using two-way video connection or telephone (telephone may be used only for codes with “audio” indicator) where the patient is calling from a personal device. Providers may also use a personal device to perform these services. The following conditions must be met for Company to make payments for telecommunication services listed on this policy:
 - A. Except for codes with “audio” indicator, the service must be furnished via an interactive video telecommunication system;
 - B. The service must be furnished by a physician or authorized practitioner credentialed with Company (may not be billed “incident to”);
 - C. The service must be furnished to an individual who is eligible for telecommunication services with Company.
- V. Inpatient telehealth consultations (HCPCS codes G0425-G0427 and G0406-G0408) are furnished to Company members in hospitals or skilled nursing facilities via telecommunication technology at the request of the physician of record, the attending physician, or other appropriate source. The physician or practitioner who furnishes the

inpatient consultation via telecommunication technology may not be the physician or practitioner of record or the attending physician or practitioner, and the inpatient telehealth consultation must be distinct from the care provided by the physician or practitioner of record or the attending physician or practitioner.

- VI. Additional telecommunication services not addressed on this policy:
- A. Telephone visits (CPT codes 99441-99443 and 98966-98968) are covered by Company as described on **Coding Policy 92.0**.
 - B. Online digital (e.g., email) services (CPT codes 99421-99423 and CPT codes 98970-98972) are covered by Company as described on **Coding Policy 53.0**.
 - C. Company also pays virtual check-in services (HCPCS code G2012) for both new and established patients.

Professional Charges

- VII. As a condition of Company payment for telecommunication services, the physician or practitioner **must be licensed to provide the service under State law**. When the physician or practitioner is licensed under State law to provide a covered telecommunication service (i.e., professional consultation, office and other outpatient visits, individual psychotherapy, or pharmacologic management), then he or she may bill for and receive payment for this service when delivered via a telecommunication system.

PROCEDURE

NEED AND DURATION OF EMERGENCY PROVISIONS

- Need for the temporary Provisions: Emergency provisions for Telehealth Services to accommodate COVID-19 Public Health Emergency (PHE).
- Documents or source relied upon: CMS Policy and Regulatory Revisions in Response to the COVID-19 PHE.
- Effective Date: February 4, 2020.
- Termination Date: December 31, 2024.
- Reassessment Date determined at Companies' sole discretion: December 31, 2024.

THIS POLICY DOES NOT REQUIRE THE PATIENT TO BE LOCATED IN AN ORIGINATING SITE. THIS IS AN EMERGENCY PROVISION SUBJECT TO CANCELLATION AT THE SOLE DISCRETION OF COMPANY.

GENERAL

The use of a telecommunication system may substitute for a face-to-face, "hands on" encounter for services listed on this policy. The CPT/HCPCS codes covered by this policy are listed on [List A](#) at the end of the policy. **Telemedicine rules do not apply when the beneficiary and the practitioner are in the same location even if audio/video technology assists in furnishing a service.**

Except for codes indicated as "audio," the codes on [List A](#) must be performed by two-way video connection.

Originating Site Facility Fee Payment Methodology

For the duration of the public health emergency, the patient may receive telecommunication services at home or when calling from a personal device and is not required to be in an originating site. The instruction in this section (Originating Site Facility Fee Payment Methodology) apply only to services that are performed when the patient is located in an originating site, such as outpatient hospital or physician's office.

To receive the originating facility site payment, submit claims with HCPCS code Q3014, "Telehealth originating site facility fee" (short description "telehealth facility fee"). The type of service for telehealth originating site facility fee is "9, other items and services."

The benefit may be billed on bill types 12X, 13X, 22X, 23X, 71X, 72X, 73X, 76X, and 85X. Unless otherwise applicable, report the originating site facility fee under revenue code 078X and include HCPCS code Q3014.

If the originating site is a physician's office, the office location code (or place of service code) "11" is the only payable setting for code Q3014. The provider who bills the originating site facility fee may not be the same provider (or the same provider group or the same tax identification number) as the provider who is billing for services performed.

Modifier G0 (Telehealth services for diagnosis, evaluation, or treatment, of symptoms of an acute stroke) may be added to Q3014 to identify services furnished for treatment of acute stroke. This modifier is not required by Company but will not affect payment if used.

Location Codes and Modifiers for Dates of Service Beginning March 1, 2020, Through December 31, 2021

For dates of service between March 1, 2020, and December 31, 2021, telecommunication services on [List A](#) on this policy may be reported either with location code 02 (Telehealth) or with the same location code that would have been used for a face-to-face service.

- **Location code 02:** Modifiers GT and 95 are not required for services billed with location code 02 and will not affect payment if used. For services with a site of service payment differential billed with location code 02, Company uses the facility payment rate.
- **Same location code as an in-person service:** Providers may use the same location code that would be used for a face-to-face service, with the addition of Modifier 95 or Modifier GT to indicate that the service was performed by telecommunication technology. Either Modifier 95

or Modifier GT is required for telecommunication services billed with the same location where the face-to-face service would have occurred.

- **Preventive medicine services** (CPT codes 99381-99397) are paid by Company when performed by two-way video connection. Use the same location code as an in-person service and append Modifier 52 and either Modifier GT or Modifier 95. Both Modifier 52 and either Modifier GT or Modifier 95 must be appended to preventive medicine codes billed as telehealth services.

Location Codes and Modifiers for Dates of Service on or After January 1, 2022

Either modifier 93 or modifier FQ is required for all services performed using audio-only communication technology on or after January 1, 2022.

Modifier 93: Synchronous telemedicine service rendered via telephone or other real-time interactive audio-only telecommunications system

Modifier FQ: The service was furnished using audio-only communication technology

The description for location code 02 changed effective January 1, 2022, and a new location code (10) was added. For dates of service on or after January 1, 2022, telecommunication services on [List A](#) on this policy must be reported either with location code 02 (Telehealth Provided Other than in Patient's Home) or location code 10 (Telehealth Provided in Patient's Home). Modifiers GT, 95, GQ, and G0 are not required but will not affect payment if used.

- **Location code 02:** Patient is located in hospital or other facility when receiving health services or health related services through telecommunication technology. Services billed with location code 02 will be paid at the facility rate.
 - **Either modifier 93 or modifier FQ is required for services performed using audio-only communication technology.**
 - Modifiers GT, 95, GQ, and G0 are not required but will not affect payment if used.
- **Location code 10:** Patient is located in a private residence (location other than a hospital or other facility) when receiving health services or health related services through telecommunication technology. Services billed with location code 10 will be paid at the non-facility rate.
 - **Either modifier 93 or modifier FQ is required for services performed using audio-only communication technology.**
 - Modifiers GT, 95, GQ, and G0 are not required but will not affect payment if used.
- **Preventive medicine services** (CPT codes 99381-99397) are paid by Company when performed by two-way video connection. Use either location code 02 or location code 10 as appropriate based on the patient's location and append Modifier 52 to the CPT code.
 - **Modifier 52 is required for preventive medicine codes performed as telehealth services.**
 - Preventive medicine services may not be performed using audio-only technology and will be denied if billed with modifier 93 or modifier FQ.

If the originating site is a physician's office, the office location code (or place of service code) "11" is the only payable setting for code Q3014. The provider who bills the originating site facility fee may not be the same provider (or the same provider group or the same tax identification number) as the provider who is billing for services performed.

Modifier G0 (Telehealth services for diagnosis, evaluation, or treatment, of symptoms of an acute stroke) may be added to Q3014 or G2025 to identify services furnished for treatment of acute stroke. This modifier is not required by Company but will not affect payment if used.

REFERENCES

1. CMS Policy and Regulatory Revisions in Response to the COVID-19 Public Health Emergency

POLICY REVISION HISTORY

Date	Revision Summary
3/2023	Annual review (converted to new template 5/2023). Original policy effective date: 3/2020
5/2023	Add HCPCS codes G3002 and G3003 retroactive to 1/1/2023. Updated guidance from Office of Civil Rights showing that only HIPAA-compliant platforms may be used for telehealth services on or after May 12, 2023.
6/2023	Changed termination date for emergency provisions from December 31, 2023, to December 31, 2024.

APPENDIX

Table 1: List A: Communication Technology Indicator

Codes with “audio” indicator on this list may be performed by telephone if two-way video connection is not available or feasible. **Either modifier 93 or modifier FQ is required for services performed using audio-only communication technology on or after January 1, 2022.**

Codes without “audio” indicator may be performed only by two-way video connection.

Code	Communication Technology
0362T	Two-Way Video Only
0373T	Two-Way Video Only
77427	Two-Way Video Only
90785	Audio or Two-Way Video
90791	Audio or Two-Way Video
90792	Audio or Two-Way Video
90832	Audio or Two-Way Video
90833	Audio or Two-Way Video
90834	Audio or Two-Way Video
90836	Audio or Two-Way Video

90837	Audio or Two-Way Video
90838	Audio or Two-Way Video
90839	Audio or Two-Way Video
90840	Audio or Two-Way Video
90845	Audio or Two-Way Video
90846	Audio or Two-Way Video
90847	Audio or Two-Way Video
90849	Audio or Two-Way Video
90853	Audio or Two-Way Video
90875	Two-Way Video Only
90901	Two-Way Video Only
90951	Two-Way Video Only
90952	Two-Way Video Only
90953	Two-Way Video Only
90954	Two-Way Video Only
90955	Two-Way Video Only
90956	Two-Way Video Only
90957	Two-Way Video Only
90958	Two-Way Video Only
90959	Two-Way Video Only
90960	Two-Way Video Only
90961	Two-Way Video Only
90962	Two-Way Video Only
90963	Two-Way Video Only
90964	Two-Way Video Only
90965	Two-Way Video Only
90966	Two-Way Video Only
90967	Two-Way Video Only
90968	Two-Way Video Only
90969	Two-Way Video Only
90970	Two-Way Video Only
92002	Two-Way Video Only
92004	Two-Way Video Only
92012	Two-Way Video Only
92014	Two-Way Video Only
92507	Audio or Two-Way Video
92508	Audio or Two-Way Video
92521	Audio or Two-Way Video
92522	Audio or Two-Way Video
92523	Audio or Two-Way Video
92524	Audio or Two-Way Video
92526	Two-Way Video Only
92550	Two-Way Video Only
92552	Two-Way Video Only

92553	Two-Way Video Only
92555	Two-Way Video Only
92556	Two-Way Video Only
92557	Two-Way Video Only
92558	Two-Way Video Only
92563	Two-Way Video Only
92565	Two-Way Video Only
92567	Two-Way Video Only
92568	Two-Way Video Only
92570	Two-Way Video Only
92587	Two-Way Video Only
92588	Two-Way Video Only
92601	Two-Way Video Only
92602	Two-Way Video Only
92603	Two-Way Video Only
92604	Two-Way Video Only
92607	Two-Way Video Only
92608	Two-Way Video Only
92609	Two-Way Video Only
92610	Two-Way Video Only
92625	Two-Way Video Only
92626	Two-Way Video Only
92627	Two-Way Video Only
93750	Two-Way Video Only
93797	Two-Way Video Only
93798	Two-Way Video Only
94002	Two-Way Video Only
94003	Two-Way Video Only
94004	Two-Way Video Only
94005	Two-Way Video Only
94664	Two-Way Video Only
95970	Two-Way Video Only
95971	Two-Way Video Only
95972	Two-Way Video Only
95983	Two-Way Video Only
95984	Two-Way Video Only
96105	Two-Way Video Only
96110	Two-Way Video Only
96112	Two-Way Video Only
96113	Two-Way Video Only
96116	Audio or Two-Way Video
96121	Audio or Two-Way Video
96125	Two-Way Video Only
96127	Audio or Two-Way Video

96130	Audio or Two-Way Video
96131	Audio or Two-Way Video
96132	Audio or Two-Way Video
96133	Audio or Two-Way Video
96136	Audio or Two-Way Video
96137	Audio or Two-Way Video
96138	Audio or Two-Way Video
96139	Audio or Two-Way Video
96156	Audio or Two-Way Video
96158	Audio or Two-Way Video
96159	Audio or Two-Way Video
96160	Audio or Two-Way Video
96161	Audio or Two-Way Video
96164	Audio or Two-Way Video
96165	Audio or Two-Way Video
96167	Audio or Two-Way Video
96168	Audio or Two-Way Video
96170	Two-Way Video Only
96171	Two-Way Video Only
97110	Two-Way Video Only
97112	Two-Way Video Only
97116	Two-Way Video Only
97129	Two-Way Video Only
97130	Two-Way Video Only
97150	Two-Way Video Only
97151	Two-Way Video Only
97152	Two-Way Video Only
97153	Two-Way Video Only
97154	Two-Way Video Only
97155	Two-Way Video Only
97156	Two-Way Video Only
97157	Two-Way Video Only
97158	Two-Way Video Only
97161	Two-Way Video Only
97162	Two-Way Video Only
97163	Two-Way Video Only
97164	Two-Way Video Only
97165	Two-Way Video Only
97166	Two-Way Video Only
97167	Two-Way Video Only
97168	Two-Way Video Only
97530	Two-Way Video Only
97535	Audio or Two-Way Video
97537	Two-Way Video Only

97542	Two-Way Video Only
97750	Two-Way Video Only
97755	Two-Way Video Only
97760	Two-Way Video Only
97761	Two-Way Video Only
97763	Two-Way Video Only
97802	Audio or Two-Way Video
97803	Audio or Two-Way Video
97804	Audio or Two-Way Video
99202	Two-Way Video Only
99203	Two-Way Video Only
99204	Two-Way Video Only
99205	Two-Way Video Only
99211	Two-Way Video Only
99212	Two-Way Video Only
99213	Two-Way Video Only
99214	Two-Way Video Only
99215	Two-Way Video Only
99217	Two-Way Video Only
99221	Two-Way Video Only
99222	Two-Way Video Only
99223	Two-Way Video Only
99231	Two-Way Video Only
99232	Two-Way Video Only
99233	Two-Way Video Only
99234	Two-Way Video Only
99235	Two-Way Video Only
99236	Two-Way Video Only
99238	Two-Way Video Only
99239	Two-Way Video Only
99281	Two-Way Video Only
99282	Two-Way Video Only
99283	Two-Way Video Only
99284	Two-Way Video Only
99285	Two-Way Video Only
99291	Two-Way Video Only
99292	Two-Way Video Only
99304	Two-Way Video Only
99305	Two-Way Video Only
99306	Two-Way Video Only
99307	Two-Way Video Only
99308	Two-Way Video Only
99309	Two-Way Video Only
99310	Two-Way Video Only

99315	Two-Way Video Only
99316	Two-Way Video Only
99341	Two-Way Video Only
99342	Two-Way Video Only
99343	Two-Way Video Only
99344	Two-Way Video Only
99345	Two-Way Video Only
99347	Two-Way Video Only
99348	Two-Way Video Only
99349	Two-Way Video Only
99350	Two-Way Video Only
99401	Two-Way Video Only
99402	Two-Way Video Only
99403	Two-Way Video Only
99404	Two-Way Video Only
99406	Audio or Two-Way Video
99407	Audio or Two-Way Video
99408	Audio or Two-Way Video
99409	Audio or Two-Way Video
99468	Two-Way Video Only
99469	Two-Way Video Only
99471	Two-Way Video Only
99472	Two-Way Video Only
99473	Two-Way Video Only
99475	Two-Way Video Only
99476	Two-Way Video Only
99477	Two-Way Video Only
99478	Two-Way Video Only
99479	Two-Way Video Only
99480	Two-Way Video Only
99483	Two-Way Video Only
99495	Two-Way Video Only
99496	Two-Way Video Only
99497	Audio or Two-Way Video
99498	Audio or Two-Way Video
99381-52	Two-Way Video Only
99382-52	Two-Way Video Only
99383-52	Two-Way Video Only
99384-52	Two-Way Video Only
99385-52	Two-Way Video Only
99386-52	Two-Way Video Only
99387-52	Two-Way Video Only
99391-52	Two-Way Video Only
99392-52	Two-Way Video Only

99393-52	Two-Way Video Only
99394-52	Two-Way Video Only
99395-52	Two-Way Video Only
99396-52	Two-Way Video Only
99397-52	Two-Way Video Only
G0108	Audio or Two-Way Video
G0109	Audio or Two-Way Video
G0270	Audio or Two-Way Video
G0296	Audio or Two-Way Video
G0396	Audio or Two-Way Video
G0397	Audio or Two-Way Video
G0406	Audio or Two-Way Video
G0407	Audio or Two-Way Video
G0408	Audio or Two-Way Video
G0410	Two-Way Video Only
G0420	Audio or Two-Way Video
G0421	Audio or Two-Way Video
G0422	Two-Way Video Only
G0423	Two-Way Video Only
G0424	Two-Way Video Only
G0425	Audio or Two-Way Video
G0426	Audio or Two-Way Video
G0427	Audio or Two-Way Video
G0438	Audio or Two-Way Video
G0439	Audio or Two-Way Video
G0442	Audio or Two-Way Video
G0443	Audio or Two-Way Video
G0444	Audio or Two-Way Video
G0445	Audio or Two-Way Video
G0446	Audio or Two-Way Video
G0447	Audio or Two-Way Video
G0459	Audio or Two-Way Video
G0470	Audio or Two-Way Video
G0506	Audio or Two-Way Video
G0508	Two-Way Video Only
G0509	Two-Way Video Only
G0513	Audio or Two-Way Video
G0514	Audio or Two-Way Video
G2086	Audio or Two-Way Video
G2087	Audio or Two-Way Video
G2088	Audio or Two-Way Video
G0316	Two-Way Video Only
G0317	Two-Way Video Only
G0318	Two-Way Video Only

G2212	Audio or Two-Way Video
G3002	Two-Way Video Only
G3003	Two-Way Video Only
S0250	(AWV Only See Policy 87.0)
S9152	Two-Way Video Only
S9443	Two-Way Video Only