Health Plan Policies, Procedures and Practices

New Updated. Blank cell – Awaiting health plan response.

A) COVID Related Billing

Page 3	For all patients that meet the CDC criteria, plans will cover 100% of the cost of COVID testing, Diagnostic Test Panels
	and testing related outpatient or emergency department visit without patient deductible or cost share?
Dago 9	In cituations where HCRS 110003 or CRT 97625 is hilled by the lab and the ERM visit is hilled by the provider how

- Page 8 In situations where HCPS U0002 or CPT 87635 is billed by the lab and the E&M visit is billed by the provider, how should providers submit the claim with the E&M visit -- so that it is clear that E&M visit is to be covered under the Emergency Order (since the testing will be billed by the lab)?
- Page 12 When do you anticipate that providers should submit claims to you for COVID testing?
- Page 13 If a claim was billed for COVID testing after the order (March 5th) and it was billed with an incorrect code, how should it be rebilled so that it is adjudicated under the order?
- Page 16 As provider organizations that do not have delegated credentialing bring on new providers to address the COVID demands, are there policies/practices under which the new provider can bill the health plan sooner rather than later

B) Alternative Treatment Locations

- Page 17 | Are ED services provided in tents and patient cars covered and if so, how should they be billed?
- Page 19 | Are outpatient services provided in patient cars covered and if so, how should they be billed?
- Page 21 | Are services provided in non-licensed space and/or non-licensed beds covered and if so, how should they be billed?
- Page 23 Is SNF care provided to COVID patients by hospitals in non-licensed beds covered and if so, how should they be billed?

C) Telehealth

- Page 25 Will a telemedicine visit for a care service be paid at the same rate as an in-person visit for that same care service?

 Page 28 Are you following the HHS guidelines for the methods that will be considered telehealth (e.g. SKYPE, Facetime, etc.)? How should they be billed?

 Page 30 Will a phone call with a patient be considered telehealth if there is no video feed; i.e. just voice interaction over the phone? If so, how should it be billed?

 Page 33 Will telehealth be a covered service for patients new to that provider?
- Page 35 For telehealth services during this interim period, will your plans allow the provider to select E&M code level based just on MDM OR on either MDM or time, with time defined as all of the time associated with the E/M on the day of the encounter?

D) Provider Workflow

- Page 36 Will the outpatient pre-authorizations and pre-authorizations for scheduled admissions be extended longer than 90 days? If so, by how much?

 Page 40 Will health plans ease authorization requirements for key components of after-hospital care, such as admission to SNFs or rehab, providing home health visits, during this COVID period?
- Page 42 Can any patient signature requirements be waived for COVID patients, e.g. Medicare MOON?

A) Billing under the Emergency Orders 20-01, 20-02

For all patients that meet the CDC criteria, plans will cover 100% of the cost, without patient deductible or cost share, of

- COVID test
- Diagnostic test panels for influenza A & B, norovirus and other coronaviruses, and respiratory syncytial virus (RSV), when any of this testing is determined medically necessary by the enrollee's health care provider, and when billed in conjunction with a COVID-19 related diagnosis code

• Testing related visit in the outpatient or Emergency Department setting as long as is billed with DX code U07.1

Follow Consensus Direction?		Health plans provide 100% coverage, as outlined in the OIC Emergency Order above, except where self-funded groups opt out of that coverage.			
Aetna	03/30/20 19. This policy covers the cost of a or emergency room visit that resu COVID-19 test. The test can be do cost-sharing waiver applies to all 0 business. The policy aligns with no		Aetna is waiving member cost-sharing for diagnostic testing related to COVID-19. This policy covers the cost of a physician-ordered test and the office, clinic or emergency room visit that results in the administration of or order of a COVID-19 test. The test can be done by any approved laboratory. This member cost-sharing waiver applies to all Commercial, Medicare and Medicaid lines of business. The policy aligns with new Families First legislation requiring all health plans to provider COVID-19 testing without cost share. The requirement also applies to self-insured plans.		
Amerigroup	Yes 03/27/20	Provider COVID FAQ	Health plan has no Self-insured plan sponsors. Amerigroup will waive any normally required cost shares— including copays, coinsurance and deductibles— for the COVID-19 test and associated visits. Test samples may be obtained in many settings including a doctor's office, urgent care, ER or even drive-through testing once available.		
CHPW	Yes 03/27/20	Provider COVID FAQ	Health plan has no Self-insured plan sponsors.		
Cigna	Most 04/01/20	COVID Provider page Scroll down to "Provider Frequently Asked Questions" and Select "COVID-19 Medical Treatment"	Cigna will waive customers' out-of-pocket costs for COVID-19 testing-related visits with in-network providers, whether at a doctor's office, urgent care clinic, emergency room or via telehealth, through May 31, 2020. Cigna also eliminated patient out-of-pocket costs for the diagnostic testing, when it's recommended by a physician. This expanded coverage includes customers in the United States who are enrolled in Cigna's employer/union sponsored group		

Page 3 of 44 Ver: 040720a

- COVID test
- Diagnostic test panels for influenza A & B, norovirus and other coronaviruses, and respiratory syncytial virus (RSV), when any of this testing is determined medically necessary by the enrollee's health care provider, and when billed in conjunction with a COVID-19 related diagnosis code
- Testing related visit in the outpatient or Emergency Department setting as long as is billed with DX code U07.1

Follow Consensus Direction?		Health plans provide 100% coverage, as outlined in the OIC Emergency Order above, except where self-funded groups opt out of that coverage.		
			insurance plans, globally-mobile plans, Medicare Advantage, Medicaid and the Individual & Family plans. Employers and other entities that sponsor self-insured plans administered by Cigna will be given the opportunity to adopt a similar coverage policy.	
Coordinated Care	Yes 03/27/20	COVID Provider page		
First Choice (TPA and PPO)	Varies by our Payers' Plans 03/27/20	COVID Provider page	First Choice Health is a PPO network that does not define the benefits. Please reach out to the individual Payers to confirm benefits. As an administrator for our self-funded health Plans, we are complying with the Families First Coronavirus Act, specifically the "Health Provisions". FCH is encouraging all FCH payors to waive patient responsibility for COVID-19 diagnostics, including testing services, performed in accordance with the Families First Coronavirus Response Act.	
HCA – Apple Health				
KP-NW	Yes 04/03/20		Most of our health plans require use of in-network providers for non- emergency services, and the COVID-19 testing and visit would be covered without deductible or cost-sharing.	

Page 4 of 44 Ver: 040720a

- COVID test
- Diagnostic test panels for influenza A & B, norovirus and other coronaviruses, and respiratory syncytial virus (RSV), when any of this testing is determined medically necessary by the enrollee's health care provider, and when billed in conjunction with a COVID-19 related diagnosis code

Testing related visit in the outpatient or Emergency Department setting as long as is billed with DX code U07.1

Follow Consensus Direction?		in the outpatient or Emergency Department setting as long as is billed with DX code U07.1 Health plans provide 100% coverage, as outlined in the OIC Emergency Order above, except where self-funded groups opt out of that coverage.		
		If a health plan covers services from out-of-network providers, then the COVID- 19 testing and visit would be covered from those providers without deductible or cost-sharing.		
		We monitor access to in-network providers, and if members cannot access care from an in-network provider, we will assist members in accessing care from out-of-network providers, and in such circumstances the COVID-19 testing and visit will be covered without deductible or cost-sharing.		
KP-WA	Most 03/27/20	Most of our health plans require use of in-network providers for non- emergency services, and the COVID-19 testing and visit would be covered without deductible or cost-sharing.		
		If a health plan covers services from out-of-network providers, then the COVID-19 testing and visit would be covered from those providers without deductible or cost-sharing.		
		We monitor access to in-network providers, and if members cannot access care from an in-network provider, we will assist members in accessing care from out-of-network providers, and in such circumstances the COVID-19 testing and visit will be covered without deductible or cost-sharing.		
		Self-insured plan sponsors will be able to opt-out of this program at their discretion		

Page 5 of 44 Ver: 040720a

- COVID test
- Diagnostic test panels for influenza A & B, norovirus and other coronaviruses, and respiratory syncytial virus (RSV), when any of this testing is determined medically necessary by the enrollee's health care provider, and when billed in conjunction with a COVID-19 related diagnosis code
- Testing related visit in the outpatient or Emergency Department setting as long as is billed with DX code U07.1

Follow Consensus Direction?		Health plans provide 100% coverage, as outlined in the OIC Emergency Order above, except where self-funded groups opt out of that coverage.		
Labor & Industries				
Medicaid FFS	Yes 03/27/20	COVID resource page	Covers any medically necessary lab tests. Medicaid does not have copays or deductible. Covered at 100%.	
Molina	Yes 04/01/20	Molina COVID Resource Page	Health plan has no Self-insured plan sponsors.	
Pacific Source	Most 03/27/20	Provider page (link available on page to download COVID FAQ).	PacificSource is also covering all outpatient, urgent care and emergency room visits, testing and radiology (applicable chest x-rays) at 100%, if billed with a COVID-19 DX (B342, B9729, U071, Z03818, Z20828). If the patient is admitted to the hospital, regular member benefits apply. Self-insured plan sponsors will be able to opt-in to this program at their discretion.	
Premera	Most 03/27/20	COVID Provider page	Premera will cover 100% of the cost of the COVID-19 lab and other diagnostic test panels and the associated visit resulting in no cost share for the fully insured members. Premera and LifeWise Health Plan of Washington customers will pay nothing out of pocket for treatment of COVID-19 or health complications associated with COVID-19, including in-patient and out-patient hospital admissions, urgent care and emergency room visits, medical transport when needed, and FDA-approved in-patient medications for both in and out of network providers. The company previously announced that it would waive cost shares for COVID-19 testing.	

Page 6 of 44 Ver: 040720a

- COVID test
- Diagnostic test panels for influenza A & B, norovirus and other coronaviruses, and respiratory syncytial virus (RSV), when any of this testing is determined medically necessary by the enrollee's health care provider, and when billed in conjunction with a COVID-19 related diagnosis code
- Testing related visit in the outpatient or Emergency Department setting as long as is billed with DX code U07.1

Follow Consensus Direction?		Health plans provide 100% coverage, as outlined in the OIC Emergency Order above, except where self-funded groups opt out of that coverage.		
			Self-funded employer groups will apply this approach but may opt out of this arrangement.	
Providence Most 04/01/20			Most - We are supporting self-insured plan sponsors who choose to implement the same or similar coverage, however, self-insured plan sponsors are able to opt-out of this coverage at their discretion.	
Regence	Most 03/27/20	COVID resource page Scroll down to COVID Testing		
UHC	Most 03/27/20		UnitedHealthcare is waiving member costs for COVID-19 testing provided at approved locations in accordance with the U.S. Centers for Disease Control and Prevention (CDC) guidelines. This coverage applies to Medicare and Medicaid members as well as our commercial insured members.	
			We are also supporting self-insured employer customers who chose to implement similar actions.	

Under the Emergency Order, some health plans will cover the entire cost, prior to deductible and with no patient cost share, of HCPS U0002 or CPT 87635 (COVID testing) and, in the outpatient setting, the associated E&M visit (with diagnosis code of U07.1). In situations where HCPS U0002 or CPT 87635 is billed by the lab and the E&M visit is billed by the provider, how should providers submit the claim with the E&M visit -- so that it is clear that E&M visit is to be covered under the Emergency Order (since the testing will be billed by the lab)? Follow coding guidelines of the health plan and submit the claim with the appropriate diagnosis after the testing has come back. (CDC COVID-19 coding guidelines) Dx Code U07.1 cannot be used until April 1st and should not be used on a claim unless a positive testing **Follow Consensus** result is returned. Direction? HCPS U0002 is for dates of service on or after February 4, 20200 and CPT 87635 for dates of service after March 13. When coding a COVID claim, providers are not able to differentiate between the following two COVID Dx scenarios: 1) E&M visit is related to COVID testing, and 2) E&M visit is related to COVID care once the testing is completed. The health plan will need to make this determination. Some health plans may pend these claims for manual processing so that they can determine which claim is paid under the order and which is paid under the patient's standard benefits. Aetna COVID page **Aetna** Yes 03/27/20 Scroll down to • 'What CPT, HCPS, ICD-10 and other codes should I be aware of related to COVID-19?" & to • "What Common Procedural Technology (CPT) codes should be used for COVID-19 testing? Medicaid MCO members have no cost sharing or copays so no cost sharing Amerigroup Yes 03/27/20 or copays would be deducted from the amount reimbursed to the provider **CHPW** Yes We expect the CR modifier, or one of the COVID diagnosis or related 03/27/20 diagnosis put out by CDC COVID response page – Under 'Interim Billing Guidelines' scroll to Cigna Yes 03/27/20 'General billing guidance for COVID-19 related services' section. For Apple Health - HCA COVID billing guidelines Providers should bill the appropriate Coordinated Yes 03/27/20 Care E/M code with the appropriate diagnosis codes including U07.1 and

> Page 8 of 44 Ver: 040720a

those found in the link attached.

Under the Emergency Order, some health plans will cover the entire cost, prior to deductible and with no patient cost share, of HCPS U0002 or CPT 87635 (COVID testing) and, in the outpatient setting, the associated E&M visit (with diagnosis code of U07.1). In situations where HCPS U0002 or CPT 87635 is billed by the lab and the E&M visit is billed by the provider, how should providers submit the claim with the E&M visit -- so that it is clear that E&M visit is to be covered under the Emergency Order (since the testing will be billed by the lab)? Follow coding guidelines of the health plan and submit the claim with the appropriate diagnosis after the testing has come back. (CDC COVID-19 coding guidelines) Dx Code U07.1 cannot be used until April 1st and should not be used on a claim unless a positive testing **Follow Consensus** result is returned. Direction? HCPS U0002 is for dates of service on or after February 4, 20200 and CPT 87635 for dates of service after March 13. When coding a COVID claim, providers are not able to differentiate between the following two COVID Dx scenarios: 1) E&M visit is related to COVID testing, and 2) E&M visit is related to COVID care once the testing is completed. The health plan will need to make this determination. Some health plans may pend these claims for manual processing so that they can determine which claim is paid under the order and which is paid under the patient's standard benefits. For Marketplace plan, for claim billed without the COVID-19 lab tests, screening related claims with diagnosis codes Z20.828 and Z03.818 will be covered with \$0 member liability. When COVID-19 diagnosis code U07.1 is appropriately coded with an E&M **First Choice** Yes (TPA and 03/27/20 code, this will indicate it's for COVID-19. If U07.1 is not effective or appropriate due to an initial visit, then refer to the recommended PPO) diagnosis coding from the CDC. HCA – Apple Health **KP-NW** The provider should bill with the appropriate screening diagnosis Yes associated with COVID-19 to include relevant ICD-10 infection codes. **KP-WA** 04/01/20 Additionally, we have established provider reconsideration processes if a provider believes the claim was paid incorrectly. Labor & **Industries**

Under the Emergency Order, some health plans will cover the entire cost, prior to deductible and with no patient cost share, of HCPS U0002 or CPT 87635 (COVID testing) and, in the outpatient setting, the associated E&M visit (with diagnosis code of U07.1). In situations where HCPS U0002 or CPT 87635 is billed by the lab and the E&M visit is billed by the provider, how should providers submit the claim with the E&M visit -- so that it is clear that E&M visit is to be covered under the Emergency Order (since the testing will be billed by the lab)? Follow coding guidelines of the health plan and submit the claim with the appropriate diagnosis after the testing has come back. (CDC COVID-19 coding guidelines) Dx Code U07.1 cannot be used until April 1st and should not be used on a claim unless a positive testing **Follow Consensus** result is returned. Direction? HCPS U0002 is for dates of service on or after February 4, 20200 and CPT 87635 for dates of service after March 13. When coding a COVID claim, providers are not able to differentiate between the following two COVID Dx scenarios: 1) E&M visit is related to COVID testing, and 2) E&M visit is related to COVID care once the testing is completed. The health plan will need to make this determination. Some health plans may pend these claims for manual processing so that they can determine which claim is paid under the order and which is paid under the patient's standard benefits. For providers that can bill for an E/M service, the testing is part of the E/M Medicaid Yes **FFS** 03/27/20 service. If the client comes in to the provider's office just for the specimen collection, then the provider can bill 99211 for the service. Molina Yes Molina COVID Resource Page Providers should include the 04/01/20 appropriate ICD-10 diagnosis code (B97.29, U07.1, Z03.818, Z20.828) with the E&M code for the visit Molina will follow the same process for all programs **Pacific** Yes 03/27/20 Source When the provider can provide a diagnosis of COVID-19, U07.1, the Premera Yes 03/27/20 diagnosis should be billed on the claims for the E&M visit. However, since the initial visit is to diagnose the patient, the COVID-19 is not expected to

> Page 10 of 44 Ver: 040720a

be available at the time of the visit. When the COVID-19 diagnosis is not available, the E&M code should be billed with one of the appropriate ICD-

Under the Emergency Order, some health plans will cover the entire cost, prior to deductible and with no patient cost share, of HCPS U0002 or CPT 87635 (COVID testing) and, in the outpatient setting, the associated E&M visit (with diagnosis code of U07.1). In situations where HCPS U0002 or CPT 87635 is billed by the lab and the E&M visit is billed by the provider, how should providers submit the claim with the E&M visit -- so that it is clear that E&M visit is to be covered under the Emergency Order (since the testing will be billed by the lab)? Follow coding guidelines of the health plan and submit the claim with the appropriate diagnosis after the testing has come back. (CDC COVID-19 coding guidelines) Dx Code U07.1 cannot be used until April 1st and should not be used on a claim unless a positive testing **Follow Consensus** result is returned. Direction? HCPS U0002 is for dates of service on or after February 4, 20200 and CPT 87635 for dates of service after March 13. When coding a COVID claim, providers are not able to differentiate between the following two COVID Dx scenarios: 1) E&M visit is related to COVID testing, and 2) E&M visit is related to COVID care once the testing is completed. The health plan will need to make this determination. Some health plans may pend these claims for manual processing so that they can determine which claim is paid under the order and which is paid under the patient's standard benefits. 10 diagnosis codes related to possible COVID-19 exposure as defined by the CDC. Premera will waive the cost share associated with the initial E&M visit when the visit is billed on the same claim as the COVID-19 lab testing. When the E&M visit is billed separately, a review will be done to identify the testing related visit. When the related visit is not identified, the E&M claim will be adjusted as identified by the provider or the member. **Providence** Yes No cost share for E&M visits associated with testing billed with HPCS codes 04/01/20 U0001, U0002 or CPT code 87365, regardless of dx code. The associated E&M visit should be billed with diagnosis code U07.1. Regence Yes 03/27/20 There may be additional recommended billing guidelines as we begin to receive more COVID-19 coded claims. UHC

When do you anticipate that providers should submit claims to you for COVID testing?				
Follow Consensus Dire	ction?	Claims can be submitted now, in some cases, the health plan will hold claims until the		
		systems are configured (with pricing) to process the claims accurately		
Aetna	Now	For Coding Guidelines, see Aetna's Response to the previous		
	03/27/20	question.		
Amerigroup	Now	Provider can submit claims for COVID testing (retroactive to		
	03/27/20	2/4/20 dates of service) at any time. Amerigroup will hold claims		
		until our systems are configured to process the claims		
		accurately.		
CHPW	Now	Provider can bill for dates of service 02/01/2020 and forward.		
	03/27/20			
Cigna	04/01	Laboratories are asked to hold any claims for COVID-19 using		
	03/27/20	code this until April 1, 2020 to ensure proper reimbursement.		
Coordinated Care	Now	The new codes are loaded in our system and will be processed		
	03/27/20	accordingly. If you submitted claims previously that rejected,		
		please resubmit your claim.		
First Choice (TPA and PPO)	Now	Codes are loaded. Claims may be processed manually until		
	03/27/20	system set up is complete.		
HCA – Apple Health				
KP-NW	Now	Our systems are currently configured to accept COVID testing		
	04/01/20	claims		
KP-WA	Now	Our systems are currently configured to accept COVID testing		
	04/01	claims		
Labor & Industries				
Medicaid FFS	Now	Provider can submit claims for COVID testing (retroactive to		
	03/27/20	2/4/20 dates of service) at any time. Some claims may need to		
		be resubmitted for dual eligible clients.		
Molina	Now	Claims can be submitted for COVID testing retroactive to the		
	04/01/20	2/4/20 date of service		
Pacific Source	Now	Submit claims using the correct CPT codes; claims that are		
	03/27/20	denied should be resubmitted with the correct codes.		
Premera	Now			

When do you anticipate that providers should submit claims to you for COVID testing?				
Follow Consensus Direction?		Claims can be submitted now, in some cases, the health plan will systems are configured (with pricing) to process the claims accura		
	03/27/20	Systems are comigared (with pricing) to process the claims accur-	ucciy	
Providence	Now 04/01/20	Our systems are currently configured to accept COVID testing claims		
Regence	Now 03/27/20	Our systems are currently accepting claims.		
UHC	04/01 03/27/20	We ask that care providers hold claims for processing until April 1, 2020.		

If a claim was billed for COVID	testing after t	he order (March 5 th) and it was billed with an incorrect code how sho is adjudicated under the order?	ould it be rebilled so that it
Follow Consensus Direction? To the extent a claim was submitted with incorrect coding, it should be rebi standard rebilling process with the corrected diagnosis and procedure code coding guidelines)			
Aetna	Yes 03/27/20	To the extent a claim was submitted with incorrect coding and reimbursement was not received in accordance with the OIC's COVID19 Emergency Order, please submit a corrected claim. For Coding Guidelines, see Aetna's Response to the previous question.	
Amerigroup	Yes 03/27/20	Amerigroup Provider Page under "Provider Resources & Documents" includes instructions on submission of corrected claims.	
CHPW	Yes 03/27/20		
Cigna			
Coordinated Care	Yes 03/27/20	If the provider feels the claim was not adjudicated probably based on evolving guidance, they can submit a corrected claim within the timeframes specified in their contract or in our Provider Handbook for reprocessing. They may also call our Customer Service Center to ask us to review their claim if they don't feel it was processed correctly as billed.	

Page 13 of 44 Ver: 040720a

If a claim was billed for COVID testing after the order (March 5 th) and it was billed with an incorrect code how should it be rebilled so that it is adjudicated under the order?			
Follow Consensus Direction?		To the extent a claim was submitted with incorrect coding, it should be rebilled following the standard rebilling process with the corrected diagnosis and procedure codes. (CDC COVID-19 coding guidelines)	
First Choice (TPA and PPO)	Yes 04/01/20	Please follow the corrected claim process and submit a corrected claim with the appropriate coding.	
HCA – Apple Health			
KP-NW KP-WA	Yes 03/27/20	If a claim was coded incorrectly and does not have the expected adjudication aligning with the COVID-19 emergency order, please	
	03,27,20	follow the normal process to submit a revised claim for readjudication or to follow the provider reconsideration process, as appropriate.	
Labor & Industries			
Medicaid FFS	Yes 03/27/20	The addition of the CR modifier to the claim will allow the claim to pay.	
Molina	Yes 04/01/20	Providers should submit a corrected claim and include one of the following ICD-10's: B97.29, U07.1, Z03.818, Z20.828	
Pacific Source		-	
Premera	Yes 03/27/20	This Probably depends on whether the claim was paid or denied or something else.	
		More than likely the diagnosis and lab test codes were not established for some of the prior submissions so if the claim was paid, I am not sure they need total resubmit. If the claim was denied, I think the reason for the denial would determine whether to rebill or not. If the "rebill" reason is to remove member cost share, then the provider should be coding the claim correctly.	
		If services were performed after the date of the order (3/5/2020 WA, 3/3/2020 AK), then the provider could rebill using the new COVID-19 lab testing codes U0001, U0002.	

Page 14 of 44 Ver: 040720a

If a claim was billed for COVID testing after the order (March 5 th) and it was billed with an incorrect code how should it be rebilled so that it is adjudicated under the order?			
Follow Consensus Direction?		To the extent a claim was submitted with incorrect coding, it shoul standard rebilling process with the corrected diagnosis and proced coding guidelines)	
		If the services were performed prior to the date of the order, there would be no adjustment needed as the cost shares are being waived if services are performed as of the date of the order.	
Providence	Yes 04/01/20		
Regence	Yes 03/27/20	Providers must bill as directed by the CDC interim guidelines (https://www.cdc.gov/nchs/data/icd/ICD-10-CM-Official-Coding-Gudance-Interim-Advice-coronavirus-feb-20-2020.pdf) or with the new ICD-10 code (U07.1). We expect anticipate corrected claims may need to be submitted.	
UHC			

Consensus Direction

New providers that are Washington Licensed/DOH approved or are registered in DOH's volunteer health practitioner system can bill for services under one of the following policies/practices. Health Plans will indicate which of the below policies/practices they adopt – RC, LT, or Both.

- 1) <u>Retro-Credentialing (RC)</u>: Once a provider is credentialed, services that they provided on or after the date of completion of credentialing application can be billed
 - Expedited Credentialing: Health Plans will expedite the credentialing process for providers that are filling positions to meet the demand of the current COVID crisis. Providers should complete the standard credentialing application and contact the health plan's provider relations team to request expedited credentialing
 - Effective Billing Date: Upon successful completion of the credentialing process, the provider's effective date for the purpose of billing will be the same as the date that their application was received by the health plan as complete.

Page 15 of 44 Ver: 040720a Claims for services rendered by providers being credentialed should be submitted not earlier than 30 days past the credentialing approval date to allow the health plan system to be set up.

Any claims submitted for services rendered by provider being credentialed prior to this timeframe will be paid as out of network, something else:

AND/OR

2) Locum Tenens (LT): The provider will fall under locum tenens and their services can be billed.

A provider can identify and authorize care for his or her patients by another provider for at least 90 days, and ideally 180 day, while the authorizing provider continues to treat patients at the organization. During the period, the provider organization can bill for locum tenes provider services and the locum tenens provider can be going through expedited credentialing.

Locum Tenens applies to all provider organizations whether or not they have delegated credentialing.

As provider organizations that do not have delegated credentialing bring on new providers to address the COVID demands, are there policies/practices under which the new provider can bill the health plan sooner rather than later?				
Follow Consensus Direction?		New providers that are Washington Licensed/DOH approved or are registered in DOH's volunteer health practitioner system can bill for services under one of the following policies/practices. Health Plans will indicate which of the policies/practices they adopt – Retro-Credentialing, Locum Tenes or Both.		
Aetna				
Amerigroup				
CHPW	Locum Tenes 04/02/20	 Paying providers who are qualified – locums and not necessarily locums. We are paying non-credentialed but qualified providers during this crisis. Additionally, we have expedited credentialing. 		
Cigna				
Coordinated Care				
First Choice (TPA and PPO)				
HCA-Apple Health				
KP-NW				

Page 16 of 44 Ver: 040720a

•	As provider organizations that do not have delegated credentialing bring on new providers to address the COVID demands, are there			
policies/practices under which the new provider can bill the health plan sooner rather than later?				
Follow Consensus Direction?		New providers that are Washington Licensed/DOH approved or are registered in DOH's volunteer health practitioner system can bill for services under one of the following policies/practices. Health Plans will indicate which of the policies/practices they adopt – Retro-Credentialing, Locum Tenes or Both.		
KP-WA				
Labor & Industries				
Medicaid FFS				
Molina	Locum			
	Tenes			
	04/06/20			
Pacific Source				
Premera				
Providence				
Regence				
UHC				

B) Alternative Treatment Locations

Are ED services provided in tents and patient cars covered and if so, how should they be billed?			
Follow Consensus Direction?		Tents and/or patient cars located in close proximity to the ED in which ED staff provide COVID care or non-COVID care will be considered extensions of the ED. Claims for that care should use Place of Service Code – 23 Emergency Room – Hospital, with Modifier CR for professional billing and Condition Code DR for institutional billing.	
Aetna	Yes 03/27/20		
Amerigroup Yes 04/01/20		If services are provided in a tent located in close proximity to the ED and the ED staff provides COVID care or non-COVID care, it will be considered extensions of the ED- POS 23. Professional services use CR modifier. For facility fee use modifier DR.	
CHPW	Yes		

Page 17 of 44 Ver: 040720a

Are ED se	Are ED services provided in tents and patient cars covered and if so, how should they be billed?			
Follow Consensus Direction?		Tents and/or patient cars located in close proximity to the ED in which ED staff provide COVID care or non-COVID care will be considered extensions of the ED. Claims for that care should use Place of Service Code – 23 Emergency Room – Hospital, with Modifier CR for professional billing and Condition Code DR for institutional billing.		
	03/27/20			
Cigna				
Coordinated Care	Yes 03/27/20	Tents and cars in proximity to the facility will be considered an extension of the facility and paid accordingly. We follow all HCA and CMS guidance in this regard.		
First Choice (TPA and PPO)	Yes 03/27/20			
HCA – Apple Health				
KP-NW KP-WA	Yes 03/27/20	When billing, the Place of Service codes should align most closely with the facility, staff and/or function being performed at that care site.		
Labor & Industries				
Medicaid FFS	Yes 03/27/20	If services are provided in a tent or in a patient car that is located in proximity to, or as an extension of the emergency room, use POS 23 and the CR modifier for all professional services and use the DR modifier for the facility fee.		
Molina	Yes 04/01/20	Providers should bill POS 23 for hospital parking lot, POS 15 is also allowed for cars		
Pacific Source	Yes 03/27/20			
Premera	Yes 03/27/20			
Providence	Yes 04/01/20			
Regence	Yes 03/27/20			

Are ED services provided in tents and patient cars covered and if so, how should they be billed?			
Follow Consensus Direction?	Tents and/or patient cars located in close proximity to the ED in which ED staff provide COVID care or non-COVID care will be considered extensions of the ED. Claims for that care should use Place of Service Code – 23 Emergency Room – Hospital, with Modifier CR for professional billing and Condition Code DR for institutional billing.		
UHC			

Are outpatient services provided in patient cars covered and if so, how should they be billed?			
Follow Consensus Direction?		Patient cars located in the parking lot of a clinic in which clinic staff provide COVID care or non-COVID care will be considered extensions of the clinic. Claims for that care should use Place of Service Code as follows: • 15 – Mobile: If the car is used as a drive up COVID testing site where a specimen is taken • 11 – Office: If the clinic is not hospital owned • 19 – Off Campus – Outpatient Hospital: If the clinic is hospital owned but not on the	
		hospital campus	ortal owned but not on the
Aetna Yes 03/27/20		Aetna recognizes place of service codes: 11 (physician office), 15 (mobile unit), 17 (Walk-in retail health clinic), 19 (off campus outpatient hospital), 20 (urgent care facility), 22 (on campus outpatient hospital), 23 (emergency room hospital, and 81 (independent laboratory).	
Amerigroup	??? 03/24/20		
CHPW	Yes 03/27/20		
Cigna			
Coordinated Care	Yes 03/27/20	We follow the Medicaid FFS guidance below.	
First Choice (TPA and PPO)	Yes 03/27/20		
HCA – Apple Health			

Page 19 of 44 Ver: 040720a

Are outpatient services provided in patient cars covered and if so, how should they be billed?				
Follow Consensus Direction?		Patient cars located in the parking lot of a clinic in which clinic staff provide COVID care or non-COVID care will be considered extensions of the clinic. Claims for that care should use Place of Service Code as follows:		
		 15 – Mobile: If the car is used as a drive up COVID testing site where a specimen is taken 11 – Office: If the clinic is not hospital owned 19 – Off Campus – Outpatient Hospital: If the clinic is hospital owned but not on the hospital campus 		
KP-NW	Yes	When billing, the Place of Service codes should align most		
KP-WA	03/27/20	closely with the facility, staff and/or function being performed at that care site.		
Labor & Industries				
Medicaid FFS	Yes 03/27/20	 Patient cars located in the parking lot of a clinic in which clinic staff provide COVID care or non-COVID care will be considered extensions of the clinic. Claims for that care should use Place of Service Code as follows: When collecting specimens to test for COVID-19 that is not associated with an E/M visit HCA is allowing CPT code 99001 to be billed. 		
		Bill with the POS that is most relevant for the situation (typically the POS you currently bill with):		
		 For provider clinics that are not hospital owned, use POS 11 with CR modifier 		
		 For hospital owned/associated and off campus, use POS 19 and the CR modifier 		
		 For visits outside of emergency rooms, use POS 23 and the CR modifier For visits in drive up sites that do not fit in the examples above, use the POS 15 and the CR modifier. 		
Molina	Yes	POS 15 is allowed for cars, POS 99 can also be submitted		

Page 20 of 44 Ver: 040720a

Are outpatient services provided in patient cars covered and if so, how should they be billed?			
Follow Consensus Direction?		Patient cars located in the parking lot of a clinic in which clinic staff provide COVID care or non-COVID care will be considered extensions of the clinic. Claims for that care should use Place of Service Code as follows:	
		 15 – Mobile: If the car is used as a drive up COVID testing site where a specimen is taken 11 – Office: If the clinic is not hospital owned 19 – Off Campus – Outpatient Hospital: If the clinic is hospital owned but not on the hospital campus 	
04/01/20			
Pacific Source	Yes 03/27/20		
Premera Yes 03/27/20			
Providence Yes 04/01/20			
Regence Yes 03/27/20			
UHC			

Are services provide	Are services provided in non-licensed space and/or non-licensed beds covered and if so, how should they be billed?			
Follow Consensus Direction?		Claims for services to COVID and non-COVID patient provided in non-licensed space and/or non-licensed beds should be submitted with the Place of Service Code most closely associated with the staff/function being performed in that space/bed as if the space/bed was licensed.		
		If the additional space is on hospital grounds, then the sponsoria and all policies and procedures would apply. If the additional special campus such as a naval ship or large tented or other temporary and procedures of the sponsoring organization would apply.	pace were off a hospital	
Aetna	Yes 03/27/20	Aetna recognizes place of service codes: 11 (physician office), 15 (mobile unit), 17 (Walk-in retail health clinic), 19 (off campus		
	,,			

Page 21 of 44 Ver: 040720a

Are services provi	ded in non-licer	nsed space and/or non-licensed beds covered and if so, how shoul	d they be billed?
Follow Consensus Direction?		Claims for services to COVID and non-COVID patient provided in non-licensed space and/or non-licensed beds should be submitted with the Place of Service Code most closely associated with the staff/function being performed in that space/bed as if the space/bed was licensed. If the additional space is on hospital grounds, then the sponsoring hospital site of service and all policies and procedures would apply. If the additional space were off a hospital campus such as a naval ship or large tented or other temporary structure then the policies and procedures of the sponsoring organization would apply.	
		outpatient hospital), 20 (urgent care facility), 22 (on campus outpatient hospital), 23 (emergency room hospital, and 81 (independent laboratory).	
Amerigroup	??? 03/24/20	Amerigroup will follow HCA guidance for Medicaid MCOs and is consulting with HCA on this question.	
CHPW	Yes 03/27/20		
Cigna			
Coordinated Care	Yes 03/27/20	CCW is following all HCA and CMS guidance, or OIC mandates.	
First Choice (TPA and PPO)	Yes 04/01/20		
HCA – Apple Health			
KP-NW	Yes	When billing, the Place of Service codes should align most	
KP-WA 03/27/20		closely with the facility, staff and/or function being performed at that care site.	
Labor & Industries			
Medicaid FFS	Varies 03/27/20	Medicaid is currently determining how these will be covered and billed. It would be based on services being rendered in those beds/spaces	
Molina	Yes 04/01/20	Molina will follow all HCA and CMS guidance, and OIC mandates.	
Pacific Source	Yes		

Page 22 of 44 Ver: 040720a

Are service	Are services provided in non-licensed space and/or non-licensed beds covered and if so, how should they be billed?			
Follow Consensus Direction?		Claims for services to COVID and non-COVID patient provided in non-licensed space and/or non-licensed beds should be submitted with the Place of Service Code most closely associated with the staff/function being performed in that space/bed as if the space/bed was licensed. If the additional space is on hospital grounds, then the sponsoring hospital site of service and all policies and procedures would apply. If the additional space were off a hospital campus such as a naval ship or large tented or other temporary structure then the policies and procedures of the sponsoring organization would apply.		
	03/27/20			
Premera	Yes 03/27/20			
Providence Yes 04/01/20				
Regence Yes 03/27/20				
UHC				

Is SNF care provided to COVID patients by hospitals in non-licensed beds covered and if so, how should they be billed?				
Follow Consensus Direction?	Claims for services to COVID patients where the SNF level care is being delivered to patients in non-licensed/uncertified beds should be submitted with the most appropriate bed type that represents the level of care of service. Optionally, condition code DR would be reported in field 18 of the UB form. Coverage is dependent up a patient have a SNF Benefit. The sponsoring hospital site of service and all policies and procedures would apply.			
Aetna				
Amerigroup				
CHPW				
Cigna				
Coordinated Care				

Is SNF care provided to COVID patients by hospitals in non-licensed beds covered and if so, how should they be billed?				
Follow Consensus Direction?		Claims for services to COVID patients where the SNF level care is being delivered to patients in non-licensed/uncertified beds should be submitted with the most appropriate bed type that represents the level of care of service. Optionally, condition code DR would be reported in field 18 of the UB form. Coverage is dependent up a patient have a SNF Benefit. The sponsoring hospital site of service and all policies and procedures would apply.		
First Choice (TPA and PPO)				
HCA – Apple Health				
KP-NW				
KP-WA				
Labor & Industries				
Medicaid FFS				
Molina Yes 04/06/20				
Pacific Source				
Premera				
Providence				
Regence				
UHC				

C) <u>Telehealth</u>

"From March 26 until April 24, in network providers will be paid at the same rate when providing services via telemedicine as they are paid for providing the same services in-person (payment parity)"

- Proclamation. Telemedicine Proc
- See Section 1 of ESSB Bill 5385 for patients and services that qualify: Telemedicine Bill

Will a telemedicine visit for a care service be paid at the same rate as an in-person visit for that same care service? **Follow Consensus Direction?** In-network providers will be paid at the same rate when providing services via telemedicine as they are paid for providing the same services in-person (payment parity) Yes In-network providers will be paid for a health care service Aetna 03/27/20 provided through telemedicine at the same rate as if the health care service was provided in person by a provider in accordance with Gov. Proclamation 20-29. Aetna's telemedicine policy is available to providers on the NaviNet and Availity portals. **Amerigroup** Yes 03/27/20 **CHPW** Yes 03/27/20 Cigna Most **COVID** Provider page Scroll down to "Interim Billing Guidelines" and Select 03/27/20 "Virtual Care Guidelines" "General Billing Guidance for both COVID and Non-COVID care Self-insured plan sponsors will be able to opt-out of this program at their discretion. **Coordinated Care** Yes 03/27/20 First Choice (TPA and Varies by First Choice Health is a PPO network that does not define the PPO) our Payers' benefits. Please reach out to the individual Payers to confirm Plans benefits.

> Page 25 of 44 Ver: 040720a

"From March 26 until April 24, in network providers will be paid at the same rate when providing services via telemedicine as they are paid for providing the same services in-person (payment parity)"

- Proclamation. <u>Telemedicine Proc</u>
- See Section 1 of ESSB Bill 5385 for patients and services that qualify: Telemedicine Bill

Will a telemedicine visit for a care service be paid at the same rate as an in-person visit for that same care service?

Follow Consensus Direction?

In-network providers will be paid at the same rate when providing services via telemedicine as they are paid for providing the same services in-person (payment parity)

O3/27/20

As an administrator for our self-funded health Plans, we are

		they are paid for providing the same services in-person (paym	ent parity)
	03/27/20	As an administrator for our self-funded health Plans, we are complying with the Families First Coronavirus Act, specifically the "Health Provisions".	
HCA – Apple Health	Yes 03/27/20		
KP-NW	Yes 03/27/20		
KP-WA	Most 03/27/20	Self-insured plan sponsors will be able to opt-out of this program at their discretion.	
Labor & Industries	Yes 03/27/20	If an E&M code allows for telephone/telehealth, telehealth visit for the E&M code is reimbursed at the same rate as the in-person version. And it is coded with POS = 2.	
Medicaid FFS	Yes 03/27/20		
Molina	Yes 03/27/20	Molina Billing Policy	
Pacific Source	Most 03/27/20	Self-insured plan sponsors will be able to opt-out of this program at their discretion.	
Premera	Most 03/27/20	-funded employer groups will apply this approach but may opt out of this arrangement.	
Providence	Most 03/27/20	We are supporting self-insured plan sponsors who choose to implement the same or similar coverage, however, self-insured plan sponsors are able to opt-out of this coverage at their discretion.	

Page 26 of 44 Ver: 040720a

"From March 26 until April 24, in network providers will be paid at the same rate when providing services via telemedicine as they are paid for providing the same services in-person (payment parity)"

- Proclamation. <u>Telemedicine Proc</u>
- See Section 1 of ESSB Bill 5385 for patients and services that qualify: Telemedicine Bill

Will a teleme	Will a telemedicine visit for a care service be paid at the same rate as an in-person visit for that same care service?				
Follow Consensus Direction?		In-network providers will be paid at the same rate when providing the same services in-person (payr	_		
Regence	Most 03/27/20	Providers should refer to our websites for the most current information and Virtual Care Reimbursement Policy: • Regence COVID • Asuris COVID • BridgeSpan COVID	Regence is temporarily expanding the services that can be offered by in-network providers via telehealth. The visits are considered the same as in-person visits and are paid consistently with in-person visits.		
			Under this expansion for claims to process correctly, claims must be submitted with POS 11 or IOP and the GT modifier. (Note: To receive reimbursement consistent with an in-office visit, the POS must be either 11 or IOP. The GT modifier will indicate that the services were rendered via telehealth.)		
			We will continue to cover the medical and behavioral health codes, as outlined in our Virtual Care Reimbursement Policy. However, providers should submit the codes in the policy with POS 11 or IOP and the GT modifier to be		

Page 27 of 44 Ver: 040720a

"From March 26 until April 24, in network providers will be paid at the same rate when providing services via telemedicine as they are paid for providing the same services in-person (payment parity)"

- Proclamation. Telemedicine Proc
- See Section 1 of ESSB Bill 5385 for patients and services that qualify: Telemedicine Bill

Will a telemedicine visit for a care service be paid at the same rate as an in-person visit for that same care service?

Follow Consensus Direction?

In-network providers will be paid at the same rate when providing services via telemedicine as they are paid for providing the same services in-person (payment parity)

reimbursed consistent with an in-person visit.

UHC

Most

O3/27/20

We are also supporting self-insured employer customers who chose to implement similar actions.

Per HHS announce	ement re telehealt	h: www.hhs.gov/hipaa/for-professionals/special-topics/emergency-penforcement-discretion-telehealth/index.html	preparedness/notification-
Are you following the	HHS guidelines for	r the methods that will be considered telehealth (e.g. SKYPE, Faceti billed?	me, etc.)? How should they be
Follow Consensus Direction? Methods of interactions between providers and COVID & non-COVID patient outline announcement (e.g. SKYPE, Facetime, etc.) would be considered telehealth and sho appropriately in accordance with CMS guidelines			•
Aetna	Yes 03/30/20	Aetna COVID page Scroll down to 'What code would be used if a physician performs a telehealth visit?"	
Amerigroup			
CHPW	Yes 03/27/20		
Cigna			
Coordinated Care	Yes 03/27/20		

Page 28 of 44 Ver: 040720a Per HHS announcement re telehealth: www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html

Are you following the HHS guidelines for the methods that will be considered telehealth (e.g. SKYPE, Facetime, etc.)? How should they be billed?

Follow Consensus Direction?		Methods of interactions between providers and COVID & non-COVID patient outlined in the announcement (e.g. SKYPE, Facetime, etc.) would be considered telehealth and should be billed appropriately in accordance with CMS guidelines	
First Choice (TPA and PPO)	Yes 03/27/20		
HCA – Apple Health	03/27/20		
KP-NW	Yes	We don't place restrictions on the platforms used by our	
KP-WA	03/27/20	contracted providers to deliver telemedicine services, however, providers must bill in accordance with CMS telehealth billing guidelines.	
Labor & Industries			
Medicaid FFS	Some 03/27/20	Zoom https://www.hca.wa.gov/hca-offers-limited-number-no-cost-telehealth-technology-licenses-providers.	
Molina	Yes 03/27/20	See Molina COVID Resource Page Scroll down to Molina's detailed COVID-19 Telehealth Billing Policy & follow link for additional details by program (Medicaid, Marketplace, Medicare)	
Pacific Source	Yes 03/27/20		
Premera	Yes 03/27/20	Premera Telehealth	The 2020 CPT code book contains significant new guidance on telehealth services as well and should be a standard reference.
Providence	Yes 03/27/20	Effective March 6, 2020 Providence Health Plan has enacted a temporary emergency policy to reimburse contracted providers	

Page 29 of 44 Ver: 040720a

Per HHS annou	uncement re telehealt	h: www.hhs.gov/hipaa/for-professionals/special-topics/emergency- enforcement-discretion-telehealth/index.html	oreparedness/notification-
Are you following t	the HHS guidelines fo	r the methods that will be considered telehealth (e.g. SKYPE, Faceti billed?	me, etc.)? How should they be
Follow Consensus Direction? Methods of interactions between providers and COVID & non-COVID patient outlined in t announcement (e.g. SKYPE, Facetime, etc.) would be considered telehealth and should be appropriately in accordance with CMS guidelines			· · · · · · · · · · · · · · · · · · ·
		for telehealth services without requiring an originating site. Providers may be paid for services performed by two-way video connections where the patient is calling from a personal device. No contract amendments or provider attestations will be required for reimbursement under this emergency policy. Our contracted providers may access this emergency policy to learn more by visiting the ProvLink provider portal at Providence Login.	
Regence	Yes 03/27/20	We are following the U.S. Department of Health and Human Services' guidance with respect to HIPAA compliant platform requirements (e.g. SKYPE, Facetime, etc. are allowed).	
UHC			

Will a phone call with a patient be considered telehealth if there is no video feed, i.e. just voice interaction over the phone? If so, how						
	should it be billed?					
		Answer to Question:				
Aetna	Yes	Aetna allows in-network Washington providers to use non-HIPAA compliant				
	03/30/20 communication platforms to provide patient care in accordance with Emergency					
	Order 20-02. The use of audio-only telephone as telemedicine is permitted at this					
		time.				
Amerigroup	Yes	Amerigroup will follow HCA guidance for Medicaid MCOs. Billing guidance for				
	03/24/20 Medicaid providers are in the HCA FAQ. This includes temporary coverage of codes					
	for telephone evaluation and management when extraordinary circumstances, as					
		defined by HCA, are involved.				

Page 30 of 44 Ver: 040720a

Will a phone call with	n a patient be	considered telehealth if there is no video feed, i.e. just voice interaction over the phone? If should it be billed?	so, how
		Answer to Question:	
CHPW	Yes 03/27/20	CHPW is allowing telephone services based on HCA and the CMS guidelines. We are also paying these services at the E&M level of care, versus the lower telephone rate.	
Cigna			
Coordinated Care	Yes 03/27/20	CCW reimburses for telephone calls using codes 99441-99423 following HCA policy.	
First Choice (TPA and PPO)	Yes 03/27/20	In order for services to be considered as telehealth, they must be billed with either telehealth modifier 95 for CPT codes in appendix P of the AMA CPT Book, or modifier GQ/GT for HCPA codes in the CMS Telehealth Code List for 2020, or Place of Service 02. See the links below for these resources. AMA Tele Guide AMA CPT Reporting CMS Tele Services	
HCA – Apple Health			
KP-NW	In Some	Depending on how the communication occurs (e.g., Skype audio vs. traditional	
KP-WA	Cases 03/27/20	telephone) the service could be billed via CMS telemedicine billing guidelines or CMS billing guidelines for telephone services (99441-99443). KP will also follow all OIC mandates.	
Labor & Industries			
Medicaid FFS	In Some Cases 03/27/20	The following codes are to be used when current practice for providing services is not an option (face to face, telemedicine) and there are extraordinary circumstances involved.	
		Code Description 99441 Telephone evaluation and management service by a physician or other qualified health care professional who may report evaluation and management services provided to an established patient, parent, or guardian not originating from a related E/M service provided within the previous 7 days nor leading to an E/M service or procedure within the	

Page 31 of 44 Ver: 040720a

Will a phone call with a patient be considered telehealth if there is no video feed, i.e. just voice interaction over the phone? If so, how should it be billed?			
			Answer to Question:
			next 24 hours or soonest available appointment; 5-10 minutes of medical discussion
		99442	Telephone evaluation and management service by a physician or other qualified health care professional who may report evaluation and management services provided to an established patient, parent, or guardian not originating from a related E/M service provided within the previous 7 days nor leading to an E/M service or procedure within the next 24 hours or soonest available appointment; 11-20 minutes of medical discussion
		99443	Telephone evaluation and management service by a physician or other qualified health care professional who may report evaluation and management services provided to an established patient, parent, or guardian not originating from a related E/M service provided within the previous 7 days nor leading to an E/M service or procedure within the next 24 hours or soonest available appointment; 21-30 minutes of medical discussion
		99421	Online digital evaluation and management service, for an established patient, for up to 7 days, cumulative time during the 7 days; 5-10 minutes
		99422	Online digital evaluation and management service, for an established patient, for up to 7 days, cumulative time during the 7 days; 11-20 minutes
		99423	Online digital evaluation and management service, for an established patient, for up to 7 days, cumulative time during the 7 days; 21 or more minutes
Molina	Yes 03/27/20	Scroll dov	wn to Molina's detailed COVID-19 Telehealth Billing Policy & follow link for all details by program (Medicaid, Marketplace, Medicare)
Pacific Source	TBD		v evaluating phone-only services.

Page 32 of 44 Ver: 040720a

Will a phone ca	ll with a patient be	considered telehealth if there is no video feed, i.e. just voice interaction over the ph should it be billed?	one? If so, how
		Answer to Question:	
	03/27/20		
Premera	Yes 03/27/20	Premera Telehealth	The 2020 CPT code book contains significant new guidance on telehealth services as well and should be a standard reference.
Providence	Yes 04/01/20	PHP will reimburse contracted providers for telephone calls based on guidelines in Payment Policy 92.0 on ProvLink. For the duration of the Covid-19 crisis, these services may be billed for both new and established patients. Contracted providers may access our telehealth policies by visiting the ProvLink provider portal at Providence Login .	
Regence	Yes 03/27/20	For claims to process correctly, claims must be submitted with POS 11 or IOP and the GT modifier. (Note: To receive reimbursement consistent with an in-office visit, the POS must be either 11 or IOP. The GT modifier will indicate that the services were rendered via telehealth.)	
UHC			

Will telehealth be a covered service for patients new to that provider?					
	Answer to Question:				
Aetna	Aetna Yes A prior face-to-face visit is not required for a provider to provide				
	03/27/20	telemedicine services.	1		

Page 33 of 44 Ver: 040720a

Will telehealth be a covered service for patients new to that provider?				
Amerigroup	Yes	HCA is allowing use of codes 99441-99443, 99421-99423 for new or		
	03/24/20	established patients during this crisis and is applying this guidance		
		to Medicaid MCOs.		
CHPW				
Cigna	Yes	During this crisis.		
	03/27/20			
Coordinated Care	Yes	There are no restrictions on new versus established patients.		
	03/27/20			
First Choice (TPA and	Yes	First Choice Health is following the CMS expanded coverage		
PPO)	03/27/20	guidelines for new and established patients.		
HCA – Apple Health				
KP-NW	Yes	During the crisis.		
KP-WA	03/27/20			
Labor & Industries				
Medicaid FFS	Yes	Telemedicine services for established and non-established patients		
	03/27/20	will be covered. For telephone and online digital E and M, which are		
		typically covered for non-established patients, Medicaid is allowing		
		use of codes 99441-99443, 99421-99423 for both new or		
		established patients, accompanied by the CR modifier, and billed at		
		the line level.		
Molina	Yes	See Molina COVID Resource Page.		
	03/27/20			
		Scroll down to Molina's detailed COVID-19 Telehealth Billing Policy		
		& follow link for additional details by program (Medicaid,		
		Marketplace, Medicare detail).		
Pacific Source	Yes	We are following CMS expanded coverage guidelines, which does		
	03/27/20	allow telehealth visits for both new and established patients.		
Premera	Yes	A new patient may be provided with telehealth services.		
	03/27/20			
Providence	Yes	PHP will reimburse contracted providers for telehealth visits		
	04/01/20	provided to new and established patients during the emergency.		

Will telehealth be a covered service for patients new to that provider?				
	Contracted providers may reference Payment Policies 92.0 and 53.0			
		on our provider portal for more information.		
		Providence Login		
Regence	Yes	A new patient may be provided with telehealth services.		
	03/27/20			
UHC				

During this interim period, CMS Guidelines allow providers to select E&M (Evaluation & Management) code level for telehealth service base upon Time or Medical Decision making. https://www.cms.gov/files/document/covid-final-ifc.pdf (page 136 from start of page to the end of the 1st full paragraph)

For telehealth services during this interim period, will your plans allow the provider to select E&M code level based just on MDM OR on either MDM or time, with time defined as all of the time associated with the E/M on the day of the encounter?

	Answer to Question			
Aetna				
Amerigroup - Commercial				
CHPW - Commercial				
Cigna				
Coordinated Care -				
Commercial				
First Choice (TPA and PPO)	Both			
	04/07/20			
HCA – Apple Health				
Medicaid FFS				
Amerigroup				
CHPW				
Coordinated Care				
Molina				
UHC Community Plan				
KP-NW	Both			
	04/07/20			

Page 35 of 44 Ver: 040720a During this interim period, CMS Guidelines allow providers to select E&M (Evaluation & Management) code level for telehealth service base upon Time or Medical Decision making. https://www.cms.gov/files/document/covid-final-ifc.pdf (page 136 from start of page to the end of the 1st full paragraph)

For telehealth services during this interim period, will your plans allow the provider to select E&M code level based just on MDM OR on either MDM or time, with time defined as all of the time associated with the E/M on the day of the encounter?

Answer to Question				
KP-WA	Both			
	04/07/20			
Labor & Industries				
Molina - Commercial				
Pacific Source				
Premera	Both			
	04/07/20			
Providence				
Regence	Both			
	04/07/20			
UHC - Commercial				

D) Provider Workflow

Will the outpatient pre	Will the outpatient pre-authorizations and pre-authorizations for scheduled admissions be extended longer than 90 days? If so, by how				
	much?				
		Answer to Question:			
Aetna	Varies 03/30/20	Prior authorization approvals are valid for at least 45 calendar days from the date of approval. However, authorization approval for most elective medical/surgical procedures are valid for 6 months.	Aetna has published "Temporary Changes in Prior Authorization/ Precertification and Admissions Protocols" for COVID19 here: https://www.aetna.com/content/dam/aetna/pdfs/aetna		

Page 36 of 44 Ver: 040720a

Will the outpatient pre-authorizations and pre-authorizations for scheduled admissions be extended longer than 90 days? If so, by how much?			
		Answer to Question:	
			com/prior-authorization- notification.pdf Additionally, when an enrollee is determined to be
			ready for discharge from a hospital and insufficient time exists for prior approval of long term care or home health care, we will deem this to be an extenuating circumstance. Please refer to our extenuating circumstance policy located here:
			http://www.aetna.com/heal thcare- professionals/documents- forms/washington- extenuating-circumstances- policy.pdf
Amerigroup	May 03/24/20	Amerigroup is extending the length of time a prior authorization is in effect for elective inpatient and outpatient procedures to 90 days. Longer extensions will be considered on a case-by-case basis.	
CHPW			
Cigna	No 03/27/20		Cigna waives prior authorizations for the transfer of its non-COVID-19 customers from acute

Page 37 of 44 Ver: 040720a

Will the outpatient pre-authorizations and pre-authorizations for scheduled admissions be extended longer than 90 days? If so, by how much?					
	Answer to Question:				
	inpatient hospitals to in- network long term acute care hospitals.				
Coordinated Care	TBD 03/27/20	We are still researching this question.			
First Choice (TPA and PPO)	TBD 03/27/20	Extensions will be considered on a case by case basis.			
HCA – Apple Health					
KP-NW KP-WA	Yes 3/31/20	• Standard process is to review initial and extension requests based on eligibility and medical necessity.			
		 Authorizations will have an immediate start date, and an extended expiration date of 12.31.20 (extended from the typical 3-6 months), WITH the following language included with the authorization: "Due to the COVID-19 pandemic, please be aware that all elective, routine, non-urgent care may be delayed in accordance with emergency orders issued. The authorization expiration date has been extended to allow adequate time for routine care to be provided once emergency orders have been lifted." All current, open authorizations, will be revised to extend the expiration date to 12.31.20. Exceptions include those authorizations in which all visits have been exhausted, inpatient and residential which are based on days, and dialysis which is already setup on a continuing 12-month cycle based on member's birthday. 			
Labor & Industries	V	Most subhariation and Consuths / 42 months / 42 months			
Medicaid FFS	Yes 03/27/20	Most authorization are 6 months/ 12 months depending on the services. If by chance, the authorization is less than 6/12 months the provider can request an extension.			
Molina	Yes	Prior authorization has been extended to 09/01/20.			

Page 38 of 44 Ver: 040720a

Will the outpatien	Will the outpatient pre-authorizations and pre-authorizations for scheduled admissions be extended longer than 90 days? If so, by how much?			
		Answer to Question:		
	03/30/20			
Pacific Source				
Premera	Yes 03/31/20	Extended the effective date out to 6 months from the initial approval date.		
Providence	TBD 04/01/20	PHP is currently evauating		
Regence	Yes 03/31/20	Effective immediately, if hospitals need to transfer a patient quickly due to the COVID-19 impact and do not have time to secure preauthorization for post-acute care settings or home-based care (i.e., skilled nursing facilities, long-term acute care hospitals and inpatient rehabilitation), we will waive the pre-authorization requirements. If a patient has services that are delayed, we will extend preauthorizations for elective inpatient admissions. Providers need to contact us to request an extension to their elective inpatient admission pre-authorization request. AIM Specialty Health (AIM) and eviCore healthcare (eviCore) are extending authorizations for six months. All pharmacy pre-authorizations that are due to expire between March 23, 2020 and June 30, 2020 will be extended six months from the date of the current expiration date to alleviate work by providers' offices.		
UHC				

Will health plans eas	Will health plans ease authorization requirements for key components of after-hospital care, such as admission to SNFs or rehab, providing home health visits, during this COVID period?			
Follow Consensus D	irection?		patient is ready for discharge from a hospital, and insufficient time health services that will follow discharge to receive approval prior to	
Aetna	Most 04/03/20	Aetna has published "Temporary Changes in Prior Authorization/ Precertification and Admissions Protocols" for COVID19 here: https://www.aetna.com/content/dam/aetna/pdfs/aetnacom/prior-authorization-notification.pdf	Self-insured plan sponsors will be able to opt-in to this program at their discretion.	
Amerigroup				
CHPW				
Cigna	Most 04/01/20	Cigna waives prior authorizations for the transfer of its non-COVID-19 customers from acute inpatient hospitals to innetwork long term acute care hospitals.	Self-insured plan sponsors will be able to opt-in to this program at their discretion.	
Coordinated Care				
First Choice (TPA and PPO)	Varies by our Payers' Plans 03/27/20	COVID Provider page	First Choice Health is a PPO network that does not define the benefits. Please reach out to the individual Payers to confirm benefits. As an administrator for our self-funded health Plans, we are complying with the Families First Coronavirus Act, specifically the "Health Provisions". FCH is encouraging all FCH payors to waive patient responsibility for COVID-19 diagnostics, including testing services, performed in accordance with the Families First Coronavirus Response Act.	
HCA – Apple Health				
KP-NW	Yes 04/03/20	Expedited authorization for DME would apply and in certain circumstances authorization for DME may be waived.		

Page 40 of 44 Ver: 040720a

Will health plans e	ase authorizat	ion requirements for key components of af health visits, during th	ter-hospital care, such as admission to SNFs or rehab, providing home is COVID period?	
Follow Consensus Direction?		Pre-authorization will be waived when a patient is ready for discharge from a hospital, and insufficient time exists for long-term care facility or home health services that will follow discharge to receive approval prior to delivery of care.		
KP-WA			Self-insured plan sponsors will be able to opt-in to this program at their discretion.	
Labor & Industries				
Medicaid FFS				
Molina				
Pacific Source	Most 04/03/20		Self-insured plan sponsors will be able to opt-in to this program at their discretion.	
Premera	Most 04/03/20	COVID Provider page	Self-insured plan sponsors will be able to opt-in to this program at their discretion.	
Providence	Most 04/03/20		Self-insured plan sponsors will be able to opt-in to this program at their discretion.	
Regence	Most 04/07/20	We are not necessarily across the board waiving prior authorization for DME. We are however committed to removing barriers in order to quickly discharge our members to alternate settings to accommodate care needs of critical members. We are available to support discharge needs and providers should contact our care management team if they are encountering any discharge barriers at 1 (866) 543-5765 from 7 a.m. to 5 p.m. Monday through Friday.	Self-insured plan sponsors will be able to opt-in to this program at their discretion.	
UHC	Most 04/03/20	. , ,	Self-insured plan sponsors will be able to opt-in to this program at their discretion.	

As providers begin to treat suspected and actual COVID patients, they are trying to get paperless in the room (less contamination). As such, providers would like to not have to get the patient to sign any forms.

Can any	patient signature re	quirements be waived for COVID patients, e.g. Medicare MOO	N?
Follow Consensus Direction?		A paperless environment with COVID patients is endorsed and strongly supported. Payers are not aware of any group contractual requirement and believe that the only signatures needed are Consent to Treat and HIPAA Notice Receipt. For these documents, HIPAA Notice Receipt and Consent to Treat, signatures are possibly required by the provider to protect themselves – and not the payer. The HIPAA notice provided by the provider to the member is not a Payer Privacy requirement but rather a Provider obligation as the covered entity. Please let the payer know if there is a specific document on which they are requiring a patient signature.	
Aetna	TBD 03/20/20	This is under consideration.	
Amerigroup	Yes 03/27/20	If/when this conflicts with HCA guidelines, will follow HCA guidelines	
CHPW			
Cigna			
Coordinated Care	TBD 3/31/20	CCW would defer to HCA guidance on this point. Providers should document all verbal interactions and agreements in the medical records.	
First Choice (TPA and PPO)	Yes 03/27/20		
HCA – Apple Health			
KP-NW	Yes 03/27/20	From a health plan perspective, HIPAA allows claims submission from the provider to the carrier without a form signed by the patient. However, the forms that are signed in a care delivery setting are often for the purposes of the patient agreeing to financial liability if the service is not covered by a health plan and informed consent. These forms are not required by an insurance company, but the actual hospital or facility may require providers to obtain signatures. In some lines of business, such as Medicare and Medicaid, in order for the provider or hospital to be paid,	

Page 42 of 44 Ver: 040720a As providers begin to treat suspected and actual COVID patients, they are trying to get paperless in the room (less contamination). As such, providers would like to not have to get the patient to sign any forms.

Can a	any patient signature re	equirements be waived for COVID patients, e.g. Medicare MOO	N?
Follow Consensus Direction?		A paperless environment with COVID patients is endorsed and strongly supported. Payers are not aware of any group contractual requirement and believe that the only signatures needed are Consent to Treat and HIPAA Notice Receipt. For these documents, HIPAA Notice Receipt and Consent to Treat, signatures are possibly required by the provider to protect themselves – and not the payer. The HIPAA notice provided by the provider to the member is not a Payer Privacy requirement but rather a Provider obligation as the covered entity. Please let the payer know if there is a specific document on which they are requiring a patient signature.	
		the patient must sign the form. Because of this, CMS and the Health Care Authority may need to loosen requirements during the COVID-19 outbreak for all services (not just flexibility for COVID-19).	
KP-WA	Yes 03/31/20	At this time, for prior authorizations expiring between 3/15/20 and 4/30/20, these authorizations will be extended for 3 additional months, subject to some exclusions. Current plan quantity limits are still applicable.	
Labor & Industries	Yes 04/01/20	For COVID patients, they may file their portion of the Report of Accident online through FileFast which does not require an electronic signature. It there was a medical visit, providers should complete the provider portion of the ROA. We have not been waiting for the provider documents to get claims allowed and benefits paid as appropriate.	
Medicaid FFS			
Molina	TBD 3/31/20	This is under consideration	
Pacific Source			
Premera	Yes 03/27/20		
Providence	Yes 04/01/20		

Page 43 of 44 Ver: 040720a

As providers begin to treat suspected and actual COVID patients, they are trying to get paperless in the room (less contamination). As suc providers would like to not have to get the patient to sign any forms.		
Can any p	atient signature red	quirements be waived for COVID patients, e.g. Medicare MOON?
Follow Consensus Dir	ection?	A paperless environment with COVID patients is endorsed and strongly supported. Payers are not aware of any group contractual requirement and believe that the only signatures needed are Consent to Treat and HIPAA Notice Receipt. For these documents, HIPAA Notice Receipt and Consent to Treat, signatures are possibly required by the provider to protect themselves – and not the payer. The HIPAA notice provided by the provider to the member is not a Payer Privacy requirement but rather a Provider obligation as the covered entity. Please let the payer know if there is a specific document on which they are requiring a patient signature.
Regence	Yes 03/27/20	
UHC	03,27,20	