April 17, 2020

**IHS/Tribal Telemedicine Questions/Answers**

**Q** - What does no geographic limitations mean?
**A** – The distance provider or the distance site can be in the same city or community of the enrolled origination provider.

**Q** – Can we bill regular E/M codes when conducted via the telephone (not with audio/visual)?
**A** – Our policy and expectations are that you would bill for the service the same as if they were provided in the office. If CPT does not require the E/M to be conducted face to face, you will be able to bill the service when provided over the phone. If the CPT guidance for the code requires a face to face encounter it cannot be billed via telemedicine.

**Q** – Can an enrolled provider conduct distance services from their own home? Would they be considered the distance provider?
**A** – Yes, a provider can conduct telehealth services from their home. The clinic they are employed with will be able to submit claims to Medicaid for reimbursement. The claims for distance services would be billed the same as if the service were provided in clinic. Medical records should clearly state how the service was provided (audio/visual, telephone), where the member was located, and where the provider was located.

**Q** – Are licensed addiction counselors able to provide services via telehealth?
**A** – Services that are billable and have been billed prior to Covid-19 are still billable via telehealth during Covid-19.

**Q** – Are we required to obtain consent at every visit?
**A** – The department does not have specific requirements on frequency. We expect you will establish a relationship with the member and explain the service delivery method. Consent documentation can be a form or verbal but must be documented in the medical records.

**Q** – Do we have the same documentation requirements when a service is provided via telemedicine?
**A** – Yes, with the addition in your notes identifying where the member was located, the provider was located, and the technology utilized.
Q – For the telephone codes, we are not able to bill the code if there was an E/M within 7 days before or the day following. Medicare is not upholding this restriction. How is Medicaid handling it?
A – We are following all CPT guidelines.

Q – Do we bill revenue code 780 when we are the distance provider?
A – No. If there is an enrolled originating provider they would bill revenue code 780, otherwise the revenue code would not be billed for a member receiving telehealth in their home.

Q - Do you have a list of HIPAA Compliant telehealth equipment?
A – The U.S. Department of Health & Human Services has published an article titled “Notification of Enforcement Discretion for Telehealth Remote Communications During the COVID-19 Nationwide Public Health Emergency”. This article is not the opinion of DPHHS but is rather a resource. You should confirm with your technology and legal team on if the software you pursue, or use is HIPAA compliant.

Q – Is a special enrollment required to be an enrolled originating site provider?
A – No, you are eligible to bill revenue code 780 under your existing enrollment.

Q – Are we able to conduct services for the Diabetes Prevention Program through telehealth?
A – Yes, DPP can be delivered via telehealth.

Q - How would dental billing work for telehealth or phone services?
A – Follow the ADA guidance that has been issued for billing dental services. The Department will be posting a provider notice with the guidance ADA recommended, this notice will be posted at the below website.
https://dphhs.mt.gov/tribalcovid19

Q – Is the 34-day prescription drug limit in effect during the pandemic? Is there any consideration to authorization overrides?
A – Montana Medicaid does authorize a 90 supply for maintenance medications. The drug classes considered maintenance drugs can be found in the Prescription Drug Program Manual.
https://medicaidprovider.mt.gov/manuals/prescriptiondrugprogrammanual

If you have questions please reach out to Lisa James IHS/Tribal Program Manager, at Lisa.James@mt.gov or by phone (406) 444-5778.