



March 18, 2020

BLAST COMMUNICATION

COVID-19 Frequently Asked Questions Edition #2 March 18, 2020

Dear Georgia Pediatrician,

This blast communication provides an update on questions #10 and #11 on telehealth included in our first installment of our COVID-19 FAQ series.

The information included in this document comes from the US Department of Health and Human Services (HHS) notice entitled, "[Notification of Enforcement Discretion for Telehealth Remote Communications During the COVID-19 Nationwide Public Health Emergency](#)" and the Georgia Department of Community Health banner message entitled; [Updated Telehealth Guidance](#). The Georgia Medicaid Telehealth Guidance manual can be found on GAMMIS under [Provider Manuals](#). The American Academy of Pediatrics has also published, [Epidemiological Characteristics of 2143 Pediatric Patients With 2019 Coronavirus Disease in China](#).

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10. What about telehealth?

The Office for Civil Rights (OCR) at the Department of Health and Human Services (HHS) released "[Notification of Enforcement Discretion for Telehealth Remote Communications During the COVID-19 Nationwide Public Health Emergency](#)" on Tuesday, March 17, 2020 which outlined the following:

- A covered health care provider that wants to use audio or video communication technology to provide telehealth to patients during the COVID-19 nationwide public health emergency can use any non-public facing remote communication product that is available to communicate with patients.
- OCR will exercise its enforcement discretion and will not impose penalties for noncompliance with the regulatory requirements under the HIPAA Rules against covered health care providers in connection with the good faith provision of telehealth during the COVID-19 nationwide public health emergency.
- The covered health care provider may use telehealth services for services related to COVID-19 as well as things like a sprained ankle, dental consultation, psychological evaluation, or other conditions.
- OCR encourages covered providers to notify patients that these third-party applications potentially introduce privacy risks
- OCR notes that providers should enable all available encryption and privacy modes when using such applications.

Source: Office for Civil Rights (OCR) at the Department of Health and Human Services (HHS)

10 a. Does Georgia Department of Community Health (DCH) permit telehealth within its Medicaid program?

Yes, Georgia Medicaid has permitted telehealth since July 1, 2018 as outlined on GAMMIS under the Telehealth Guidance manual. Additionally, a banner message was posted on March 17, 2020 announcing that the DCH was waiving telehealth originating site limitations to permit telehealth services to be provided by use of webcam or other audio and video technology or video cell phone communication. The Telehealth Guidance manual notes the following:

- Claims for telehealth services are to include appropriate CPT or HCPCS code for the professional service.
- GT modifier is required as applicable
- Use of POS 02 indicates a Telehealth service
- GQ modifier is still required as applicable.
- Originating sites are paid an originating site facility fee for telehealth services as described by HCPCS code Q3014 with a payment of \$20.52.
- Hospitals are eligible to receive reimbursement for a facility fee for telehealth when operating as the originating site.
- Claims must be submitted with revenue code 780 (telehealth) and type of bill 131.

Source: DXC via GAMMIS "Updated Telehealth Guidance" March 17, 2020

11. Can free services such as Skype or video-chat be used instead of buying a telehealth service?

- Tools such as video chats, including *Apple FaceTime*, *Facebook Messenger video chat*, *Google Hangouts video*, or *Skype* are all permissible for covered healthcare providers under this notice are now permissible under the Office for Civil Rights (OCR) at the Department of Health and Human Services (HHS).
- Applications such as *Facebook Live*, *Twitch*, *TikTok*, and similar video communication applications are public facing, and **should not** be used in the provision of telehealth by covered health care providers.

Source: Office for Civil Rights (OCR) at the Department of Health and Human Services (HHS)

Additionally, the Medical Association of Georgia has announced a free COVID-19 in ambulatory setting CME webinar scheduled for this Friday. For details please click [here](#).

Sincerely,

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Chapter President