



STATE OF NEW HAMPSHIRE
DEPARTMENT OF HEALTH AND HUMAN SERVICES

New Hampshire Medicaid Program

To: All NH Medicaid Enrolled Medicaid to Schools Providers
From: Division of Medicaid Services
Date: May 7, 2020
Subject: NH Medicaid to Schools Supplemental Fact Sheet
COVID-19 Preparedness and Response

This supplemental fact sheet is being issued in response to questions received from Medicaid to Schools billing agents around implementation of telehealth school- based services outlined in the Department's *Telehealth Informational Bulletin* dated April 1, 2020, for the Medicaid population during the COVID-19 state of emergency.

Background:

In order to protect the public's health and mitigate the spread of COVID-19, Governor Sununu signed an emergency order effective March 18, that expanded the coverage of telehealth services for commercial insurance, and Medicaid, including Medicaid Managed Care Organizations (MCOs). The purpose of the telehealth expansion is provide another tool for schools to use to deliver needed medically necessary services. It is not the expectation that all school- based services can and should be conducted via telehealth. The decision to do so rests with each school district.

Definition of Telehealth and Terms:

Telehealth is the use of telecommunications technologies for remote delivery of medical services. Telehealth is used to facilitate live contact directly between an individual/individual's family and a provider.

Originating Site: An originating site is the physical location where the child/child's parent/guardian are located during the telehealth visit.

There are no restrictions on location of originating sites. Medicaid payment is not made to the originating site even if the site is other than the child's home/ residence.

Distant Site: The distant site is where the Medicaid to School's provider is physically located during the telehealth visit. Providers may render telehealth services from their private residence (remote site) instead of having to come into the school. Confidentiality and privacy protections however still apply. The address on the claim should reflect the address of the billing provider not the address of the performing provider conducting the telehealth service.

Eligible Provider Types: All services provided via telehealth must be within the provider's professional scope of practice and He-W 589.04. The following provider types are eligible to provide telehealth services:

- Occupational Therapists (OTs)
- Physical Therapists (PTs)
- Speech and Language Pathologists (SLPs)
- Rehabilitation Assistants
- Psychologists
- Board Certified Behavior Analysts (BCBAs)
- School Physicians
- Psychiatrists
- Advanced Registered Nurse Practitioners (APRNs) and Registered Nurses (RNs)
- Licensed alcohol and drug counselors (LADC) and master licensed alcohol and drug counselors (MLADC) per He-W 513
- Psychotherapists and Mental Health Practitioners

Providers who are not recognized as a qualified Medicaid treatment providers, i.e. School Guidance Counselors, are not eligible to receive Medicaid reimbursement for telehealth services. NH Medicaid enrolled providers located and enrolled in another state must get a NH temporary emergency license if they plan on practicing in New Hampshire or offering telehealth to any resident living in New Hampshire the per the COVID-19 Governor's Emergency Order #15. <https://www.governor.nh.gov/news-media/emergency-orders/documents/emergency-order-15.pdf>

What is Billable?

Any direct service that would have previously been rendered and Medicaid covered as face-to-face may now be rendered via telehealth. This includes both medical services as well as behavioral health services. Follow up with students on home activities that normally would have been done face- to- face would be considered direct services. Work that Rehabilitation Assistants are doing remotely in support of students such as sensory exercises, teaching communication skills or other such medically related activities in support of the student's plan of care would be billable. Notification to NH Medicaid to transition an individual from face- to- face direct treatment to telehealth visits is not required.

What is Non-Covered?

- Indirect services specifically services that include preparation time for telehealth telecommunications visits are not covered.
- Supervision of other licensed staff such as OT assistants and ST assistants is not covered.
- Reimbursement under transportation to deliver medical equipment to students is not covered.

Consent for Treatment via Telehealth and Documentation Requirements:

Per guidance released by CMS, verbal consent by the student's parent or guardian to a telehealth visit should be documented in the provider's visit documentation note. Consent may also be obtained via email or text. All other documentation requirements remain in effect.

Telehealth Reimbursement and Billing

NH Medicaid pays the same rate as if the service was provided face- to- face. Billing for the service delivered should identify the CPT codes typically used for in-person visits with the addition of the GT modifier and place of service 02 (telehealth) to the claim form. The use of the GT modifier and the 02 place of service are for all Medicaid to Schools covered procedure codes both medical and behavioral health. Medicaid is not adopting a different set of procedure codes specific to telehealth.

Please use the current list of billing codes provided by the Bureau of Developmental Services. These codes have been increased by 3.1% effective 1/1/2020. NH Medicaid is not implementing the proposed new codes listed in the draft billing manual discussed in February 2020 until the next 2020-2021 school year.

Key Takeaways

- OTs, PTs, SLPs providers may conduct telehealth visits for Medicaid even though Medicare does not recognize these provider types for telehealth services.
- Applicable State practice acts for non-physician practitioners remain in effect relative to provision of telehealth services.
- The expansion of telehealth services is not intended to expand the scope of services provided by Medicaid. Services not paid for by Medicaid currently will not be paid for under telehealth.
- Per guidance issue by the Office of Civil Rights (OCR) eligible telehealth providers may use popular applications that allow video chats including Apple FaceTime, Facebook Messenger Video chat, Google Handouts video or Skype.
- Visits with both video and audio are the preferred method of providing telehealth services. However, audio-only services may be billed in the same manner.

If you have questions about this notice, please submit your questions to the Department's Medicaid to Schools mailbox at MTS@dhhs.nh.gov .

Further informational bulletins may be issued as telehealth implementation continues during this state of emergency.