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# State of Nevada Department of Health and Human Services

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Advisory Committee on Medicaid Innovation  
Telehealth

Division of Health Care Financing and Policy (DHCFP)

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6/25/2020

*Helping people. It's who we are and what we do.*



# Agenda

## Presentation Objectives:

- Telehealth Definitions
- Medicaid Telehealth Policy – before and during the COVID-19 pandemic
- Evolution in telehealth policy – policy changes post-COVID-19 public health emergency



# Telehealth - Definition

The use of a telecommunications system to substitute for an in-person encounter for professional consultations, office visits, office psychiatry services and a limited number of other medical services.



# Centers for Medicare & Medicaid Services Telehealth Policy

- “States have a great deal of flexibility with respect to covering Medicaid and CHIP services provided via telehealth. States have the option to determine whether (or not) to utilize telehealth; what types of services to cover; where in the state it can be utilized; how it is implemented; what types of practitioners or providers may deliver services via telehealth...and reimbursement rates.”



# Nevada Medicaid Policy- Pre-COVID 19 pandemic

- Nevada has a long history of supporting and promoting telehealth. The state was classified as a “progressive” telehealth state by Manatt Health in a 2018 50-State Survey of State Telehealth Laws and Medicaid Policies.
- All other policies and requirements are the same for telehealth services (such as prior authorization requirements)
- Services must be clinically appropriate and within the scope of practice of the provider
- Services have parity with in-person health care services
- Services must be delivered via HIPAA compliant audio-visual telecommunications systems \*
- Modes of Delivery: Nevada Medicaid currently covers: Live (synchronous) audio-video connection and store-and-forward; does not currently cover remote patient monitoring
- A tele-presenter is not required as a condition of reimbursement



# Who Can Practice Telehealth?

- Nevada is one of 19 states that do not place restrictions on which health care providers can practice using telehealth technology.
- Telehealth may be used by and Nevada Medicaid and Nevada Check Up provider working within their scope of practice.
- Providers are required to maintain best practice standards and perform services via telehealth that are clinically appropriate and within the scope of practice of the health care provider as defined by the licensing board.





# Covered Services

- Nevada Medicaid covers two way videoconferencing and store & forward telehealth modes.



# Covered Sites:

- Provider's office
- Critical Access Hospital (CAH)
- Rural Health Clinic (RHC)
- Federally Qualified Health Center (FQHC)
- Hospital
- End State Renal Disease (ESRD) facility
- Skilled Nursing Facility
- Community Mental Health Centers
- Indian Health Services
- School Based Health Centers
- Schools
- Family Planning Clinics
- Public Health Clinics
- Comprehensive Outpatient Rehab Facilities
- Community Health Clinics
- HIV Clinics
- Therapy offices
- Chiropractic Offices
- Community Paramedic Services
- Recipient's smart phone or home computer (no facility fee)





# Non-Covered Services

- A. Telephone calls;
- B. Images transmitted via facsimile machines (faxes);
- C. Text messages;
- D. Electronic mail (email)



# Non-Covered Services Cont.

- The following services must be provided in-person and are not considered appropriate services to be provided via telehealth:

- Basic Skills Training (BST)
- Psychosocial Rehabilitation (PSR)
- Personal Care Services (PCS)
- Home Health Services
- Private Duty Nursing (PDN) Services



# Originating Site vs Distant Site

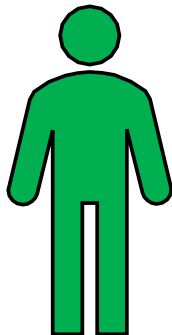
- **Originating Site**

- The location that the patient is receiving telehealth services from (patient's home, school, another clinic).
- Must be located within Nevada (or catchment area)

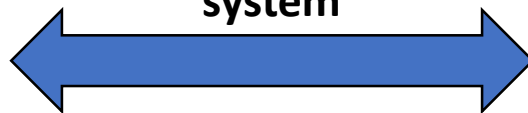
- **Distant Site**

- The location of the healthcare professional who is providing the telehealth service

**Patient at  
Originating Site**



**HIPPA compliant  
telecommunication  
system**



**Provider at  
Distant Site**





# How to Bill for Telehealth

- Telehealth Billing Guide

[https://www.medicaid.nv.gov/Downloads/provider/  
NV\\_Billing\\_Telehealth.pdf](https://www.medicaid.nv.gov/Downloads/provider/NV_Billing_Telehealth.pdf)

- Telehealth Billing Guidelines Web Announcement  
2141

[https://www.medicaid.nv.gov/Downloads/provider/  
web\\_announcement\\_2149\\_20200326.pdf](https://www.medicaid.nv.gov/Downloads/provider/web_announcement_2149_20200326.pdf)

# Telehealth and the COVID-19 Response

- In response to COVID, 44 States, including Nevada, expanded the types of services that could be delivered using telehealth. The greatest expansion in allowable services was for physical, speech, and occupational therapy. Nevada also added coverage for maternity care and long-term services and supports.
- 47 states designated home as an originating site; this was a new policy in 26 of these 47 states
- Modalities: NV added the telephonic modality
- 32 states (including NV) require payment parity for in-person and telehealth services
- Unclear how much telehealth expansion will continue beyond the public health emergency, but many suggest that the “genie is out of the bottle”



# COVID-19 State of Emergency Changes

- During COVID-19 Nevada Medicaid and the Federal Government have relaxed some of the telehealth requirements
  - Can be provided by a non-HIPAA compliant platform such as Skype, FaceTime, Audio only.
  - Nevada Medicaid has temporarily lifted the telephonic restrictions per Centers for Medicare & Medicaid Services (CMS) guidance.
  - Placing no restrictions on the use of telehealth for group therapy.
  - Allowing telehealth to be utilized for physical therapy (PT), occupational therapy (OT) and speech therapy (ST) while maintaining visual sight of the recipient.
  - Applied Behavior Analysis (ABA) supervision, assessment and parent training can be conducted via telehealth in addition to one-on one Adaptive Behavior Treatment.
  - Allowing Home Health Agencies and Hospice Agencies to conduct initial and recertification assessment in addition to waiving the requirement for a nurse to conduct an on-site visit every two weeks. Services provided via telehealth must maintain audio and visual modalities, telephone only is not allowed.
  - Psychosocial Rehabilitation (PSR) services will be permitted for individuals under the age of 18 using audio and visual communication.



# COVID-19 State of Emergency Changes cont.

- Nevada Medicaid's COVID-19 Response Webpage
  - <http://dhcfp.nv.gov/covid19/>
    - [Link to 3/17/20 Memo](#) - Federal guidance temporarily lifting the telephonic restriction.
    - [Link to 3/19/20 Memo](#) - Placing no restrictions on the use of telehealth for group therapy sessions.
    - [Link to 3/27/20 Memo](#) - Allowing telehealth for PT, OT, ST. Allowing supervision, assessments and parent training via telehealth for ABA.
    - [Link to 4/15/20 Memo](#) - Allowing Home Health Agencies and Hospice Agencies to use telehealth for initial and recertification assessments.
    - [Link to 4/28/20 Memo](#) – PSR services can be conducted utilizing audio-visual communication for individuals under the age of 18.
    - [Link to 5/26/20 Memo](#) – For ABA, allowing one-on one Adaptive Behavior Treatment via visual modality.
- Please continue to check the COVID-19 Webpage for further updates.

# Resources

- Medicaid Services Manual (MSM), Chapter 3400- Telehealth Services

<http://dhcfp.nv.gov/Resources/AdminSupport/Manuals/MSM/C3400/Chapter3400/>

- Nevada Medicaid Billing Guide- Telehealth

[https://www.medicaid.nv.gov/Downloads/provider/NV\\_Billing\\_Telehealth.pdf](https://www.medicaid.nv.gov/Downloads/provider/NV_Billing_Telehealth.pdf)

- DHCFP Telehealth Resource Guide

[http://dhcfp.nv.gov/uploadedFiles/dhcfpnvgov/content/Pgms/CPT/COVID-19/Telehealth%20Resource%20Guide\\_ADA.pdf](http://dhcfp.nv.gov/uploadedFiles/dhcfpnvgov/content/Pgms/CPT/COVID-19/Telehealth%20Resource%20Guide_ADA.pdf)

- Medicaid.gov Telemedicine Resource Guide

<https://www.medicaid.gov/medicaid/benefits/telemedicine/index.html>

- Center for Connected Health Policy,

<https://www.cchpca.org>

- Telehealth Resource Center

<https://www.telehealthresourcecenter.org/who-your-trc/>

- National Frontier and Rural Telehealth (NFARtec) Education Center

<https://www.nfartec.org/technology-based-supervision-guidelines/>

- Mental Health Technology Transfer Center (MHTTC) Network

<https://mhttcnetwork.org/>







# Questions?



# Contact Information

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# Acronyms

- **ABA-** Applied Behavior Analysis
- **BST-** Basic Skills Training
- **CMS** – Centers for Medicare & Medicaid Services
- **CPT-** Current Procedural Terminology
- **DHCFP-** Division of Health Care Financing and Policy
- **DME-** Durable Medical Equipment
- **HCPCS** – Healthcare Common Procedure Coding System
- **HIPAA-** Health Insurance Portability and Accountability Act
- **MSM-** Medicaid Services Manual
- **NFARtec-** National Frontier and Rural Telehealth
- **OT-** Occupational Therapy
- **PCS-** Personal Care Services
- **PDN-** Private Duty Nursing
- **POS-** Place of Service
- **PSR-** Psychosocial Rehabilitation
- **PT-** Physical Therapy
- **ST-** Speech Therapy