



## COVID-19 Billing & Reimbursement Frequently Asked Questions:

### 1. Is Telehealth acceptable in place of In-Person Visit (face-to-face)?

- YES** - Telehealth has been approved in place of the **in-person visit with an approved telehealth provider** during the PHE (must be audio and video)
- Approved Telehealth Providers - Physicians, Nurse Practitioners, Clinical Nurse Specialists, Physician Assistant**
- Elimination of the 3-year established patient relationship requirement from the telehealth provisions in earlier COVID-19 relief legislation
- Please note regardless if telehealth is used in place of an in-person visit, ALL coverage criteria are still applicable and medical necessity must be documented in the medical record to justify the items provided (**exception certain respiratory policies**)
- IFR – allows additional practitioners to order home medical equipment and supplies under Medicaid Home Health Benefit as of March 1, 2020
  - Must be within their scope of practice
- As of April 9, telehealth has NOT been approved for PTs and OTs conducting the required specialty evaluation for complex rehab mobility products as they are not listed as an approved provider of telehealth
- There has been no guidance specifically on telehealth for the **ATP** assessment, however, if this is the only means to safely conduct the assessment, please note the reason and ensure **all required content is documented (trunk and limb measurements, etc.)**

### 2. Implications of NCDs/LCDs during the Public Health Emergency (PHE) outlined in 3 levels

#### Level I

- In-person visit/face-to-face **IS required** as it's a statutory requirement
- In-person visit may be conducted via telehealth (audio **and** video)
- **Clinical indications/coverage criteria must be met**

### Product Categories

- ✓ Power Mobility Devices (PMDs)
- ✓ Therapeutic Shoes for Diabetes

### Level II

- In-person visit/face-to-face **IS NOT required**
- In-person visit may be conducted via telehealth (audio **and** video)
- **Clinical indications/coverage criteria must be met**

### Product Categories

- ✓ Manual Chairs
- ✓ Hospital Beds
- ✓ Nebbs
- ✓ HFCWO
- ✓ NPWT
- ✓ Support Surfaces
- ✓ Prosthetic, Orthotics
- ✓ Supplies
- ✓ **All Other Policies** not listed in level I and III

### LEVEL III


- In-person visit/face-to-face **IS NOT required**
- In-person visit may be conducted via telehealth (audio **and** video)
- Clinical indications/coverage criteria **suspended temporarily during the PHE**

### Product Categories

- ✓ NCD 240.2 Home Oxygen
- ✓ NCD 240.4 Continuous Positive Airway Pressure for Obstructive Sleep Apnea
- ✓ LCD L33800 Respiratory Assist Devices (ventilators for home use)
- ✓ NCD 240.5 Intrapulmonary Percussive Ventilator
- ✓ LCD L33797 Oxygen and Oxygen Equipment (for home use)
- ✓ NCD 190.11 Home Prothrombin Time/International Normalized Ratio (PT/INR) Monitoring for Anticoagulation Management
- ✓ NCD 280.14 Infusion Pumps
- ✓ LCD L33794 External Infusion Pumps
- ✓ Non-Invasive Ventilators (NIV)

### 3. Has CMS Relaxed Signature Requirements?

- CMS is **waiving signature** and **proof of delivery requirements** for Part B drugs and **Durable Medical Equipment**

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- ❑ When a signature cannot be obtained because of the inability to collect signatures:
    - Suppliers should document in the medical record the appropriate date of delivery and that a **signature was not able to be obtained because of COVID-19**
    - Can still ship items to home via shipping service, follow method 2 POD – shipping invoice with tracking #, confirmation of delivery with correlating tracking #
  - ❑ Orders to meet continued medical need- try to get an order signed by treating practitioner (email, fax). If this cannot be done then document the situation COVID-19 – office closed, date time
  - ❑ **Also, check your state law requirements**