Telehealth for ESRD Providers

…part of a solution to help stop the spread of COVID-19
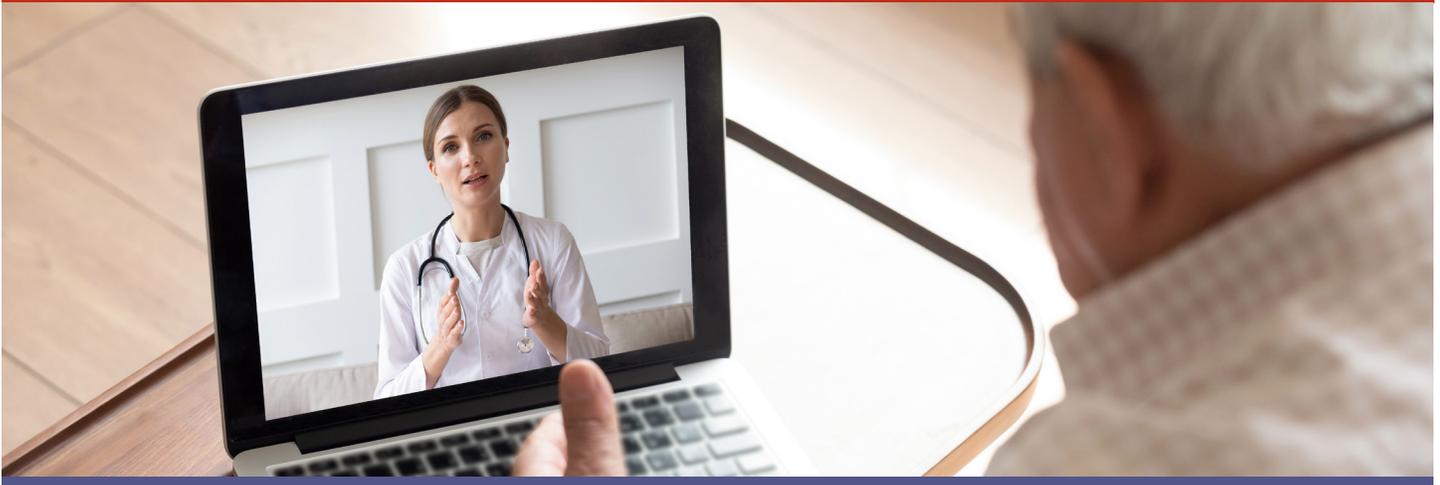
What has changed to make telehealth more available for use during the COVID-19 Outbreak?

Under the 1135-Waiver authority and the Coronavirus Preparedness and Response Supplemental Appropriation Act, Medicare coverage for telehealth services was expanded with effective date of March 1, 2020. This expansion allows for the use of technology to help people who need routine care get access to providers, while limiting their exposure to possible situations that could lead to their contracting or spreading the virus.

Who can provide healthcare services through telemedicine?

A range of providers including doctors, nurse practitioners, physician assistants, certified nurse assistants, clinical psychologists, registered dietitians, and licensed clinical social workers are able to offer telehealth as long as it's appropriate for the patient. Each discipline should follow regulations based on their state and their organization's direction.

What is covered for reimbursement?

- Telehealth services for patients located at their homes at the time of the virtual visit.
- Coverage of patients with no prior established relationship.
- Use of telecommunications technologies with audio and video capabilities that allow for two-way, real time interactive communication. This could include communications using telephones.

What are some specific recommendations for use of telehealth in the care of ESRD patients during the COVID-19 Outbreak?

- Physician visits for home dialysis patients.
- Initial appointments for transplant evaluation.
- Visits with stable in-center hemodialysis patients during the CMS Waiver of Conditions of Coverage 494.90(b)(4) which requires for a monthly in-person visit.

How can a provider bill for telehealth services?

Telehealth services are generally billed as an in-person visit and payed at the same rate. However, the designated Place-of-Service (POS) code should indicate '02-Telehealth'.

When can you start providing care through telehealth platforms?

Reimbursement to clinicians offering telehealth services is effective as of March 1, 2020 and extended through the duration of the COVID-19 pandemic, as indicated per the 1135-Waiver and the Coronavirus Preparedness and Response Supplemental Appropriations Act.

How can you provide care through telemedicine?

There are three main types of virtual services physicians and other professionals can provide:

- **Medicare telehealth visits** (as regular in-person visits)
  - HCPCS/CPT Codes: 99201-99215 for outpatient or office services; G0425-G0427 for ED or initial inpatient services; G0406-G0408 for follow up inpatient services

- **Virtual check-ins** (5 to 10-minute visit that mitigates the need for in-person visit)
  - HCPCS Codes: G2010, G2012

- **e-Visits** (communication between patient/provider through online patient portal)
  - HCPCS/CPT Codes: 99421-99423, G2061-G2063

- **Telephone Visits**
  - CPT Codes: 98966/99441 (5-10 minutes); 98967/99442 (11-20 minutes); and 98968/99443 (21-30 minutes)

Do I need to use a HIPAA compliant system or specialized technology?

Effective immediately, the Department of Health and Human Services (HHS) Office for Civil Rights (OCR) will exercise enforcement discretion and waive penalties for HIPAA violations against health care providers that serve patients in good faith through everyday communications technologies, such as FaceTime or Skype, during the COVID-19 nationwide public health emergency. If you are considering establishing a permanent telemedicine program, provided to the right are links to telemedicine vendors to consider.

If you are considering telehealth as a platform for providing care to ESRD patients, please review the following resources for more information:

- CMS – ESRD Provider Telehealth and Telemedicine Toolkit:
  https://www.cms.gov/files/document/esrd-provider-telehealth-telemedicine-toolkit.pdf

- CMS – Medicare Telemedicine Health Care Provider Fact Sheet:
  https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet

- Medicare Telehealth Frequently Asked Questions (FAQs):
  https://edit.cms.gov/files/document/medicare-telehealth-frequently-asked-questions-faqs-31720.pdf

- CMS – End Stage Renal Disease (ESRD) Facilities: CMS Flexibilities to Fight COVID-19 (Waivers):
  https://www.cms.gov/files/document/covid-19-esrd-facilities.pdf

- Renal Physicians Association – Guidance on Billing and Coding for Remote Nephrology Services:
  https://cdn.ymaws.com/www.renalmd.org/resource/resmgr/covid_19/rev-rpa_guidance_on_billing_.pdf

- Telehealth Start-Up and Resource Guide:
  https://www.healthit.gov/sites/default/files/telehealthguide_final_0.pdf

- List of Telehealth Services that can be provided under the new emergency declaration:
  https://www.cms.gov/Medicare/Medicare-General-Information/Telehealth/Telehealth-Codes

- Telemedicine Vendors Directory:
  https://telemedicine.arizona.edu/servicedirectory

- Coverage and Payment Related to COVID-10 Medicare:
  https://www.cms.gov/files/document/03052020-medicare-covid-19-fact-sheet.pdf

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