

Telehealth Expansion During The National Public Health Emergency For The COVID-19 Pandemic Extended Through December 31st, 2020

In March, Avera Health Plans and DAKOTACARE announced modifications to our reimbursement policy for telehealth services to preserve access to care while preventing the further spread of the novel coronavirus. While the return to normalcy is underway, it remains important that a conservative approach be followed as the “new normal” begins to emerge. The original announcement on telehealth during the pandemic was effective with dates of service March 17th through June 14th. Avera Health Plans and DAKOTACARE will continue to support this expanded access to telehealth services through 12/31/20 or as long as the federal government permits, which allows enhanced care access and improved health care quality with no cost to our members.

As a recap, these provisions include:

- Expansion of the list of CPT codes normally permitted to be performed via telehealth. Our standard Telehealth Policy is a compilation of all of the standard CPT[®] codes permitted by CMS (notwithstanding a Public Health Emergency declaration) and all of the CPT[®] codes listed in CPT[®] Appendix P. The expanded list of codes under the exception period are posted on our website and include all of the codes subsequently added by CMS including the CMS announcements of additional expansion made on March 30th and April 30th respectively.
- Reimbursement rates at the equivalent in-person (non-facility) fee schedule values.
- Waiver of member cost share regardless of whether the telehealth service was related to COVID-19 or not.
- Relaxation of the HIPAA requirements and technology platforms permitted for telehealth consistent with the prior announcement posted by the Health and Human Services Agency including use of telephone (audio-only) technologies where appropriate. The audio-only provision ends 8/31/20 and beginning 9/1/20, only those telehealth services which use real-time interactive audio-video technologies are considered eligible for reimbursement.

We will continue to monitor the situation and adapt any additional CPT[®] codes that may be announced by CMS. With each of the prior releases of CPT[®] code expansions announced by CMS, the changes were made retroactive to March 17th and any prior claims that may have been denied were reprocessed accordingly. Telehealth claims for services billed outside of the scope of CPT[®] codes we have approved in our listing will continue to be denied and we encourage you to check the online listing frequently for any updates.

As a reminder, for accurate reimbursement of telehealth claims, follow the billing standards outlined in our Telehealth Reimbursement Policy including:

- Use of the telehealth place of service code 02.
- Do not use modifier GT.
- Modifier 95 is acceptable but not required.
- When use of audio-only telephonic technology is used, it should be documented as such in the medical record.
- Telehealth services require the same level of medical record documentation as any equivalent face-to-face encounter or service. The totality of the communication and information exchanged

between the health care professional and patient during the course of the telehealth service must be of an amount and nature that would be sufficient to meet the key components and/or requirements of the same service when rendered via face-to-face interaction.

This notice is applicable to Avera Health Plans fully-insured lines of business, group numbers beginning IA, SD or NE and to DAKOTACARE HMO business. Self-funded employer groups are being presented with this position on telehealth extension as a recommended option, but each self-funded employer group will make their own benefit determination. We will update our COVID-19 resources page with additional details as the self-funded employer groups give us their benefits position or you can contact our Customer Care team:

- Avera Health Plans: 1-888-322-2115, 8 a.m. to 5 p.m. CT, Monday through Friday
- DAKOTACARE: 1-800-325-5598, 8 a.m. to 5 p.m. CT, Monday through Friday

The current, complete list of telehealth eligible services has been included with this communication for reference and will be maintained COVID-19 resources page.