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ALL PLAN LETTER

DATE: April 7, 2020

TO: All Commercial Health Care Service Plans¹

FROM: Sarah Ream, Acting General Counsel

SUBJECT: APL 20-013 - Billing for Telehealth Services; Telehealth for the Delivery of Services

On March 18, 2020, the Department of Managed Health Care (Department) issued an All Plan Letter (APL 20-009²) directing all health plans to:

1. Reimburse providers at the same rate, whether a service is provided in-person or through telehealth, if the service is the same regardless of the modality of delivery, as determined by the provider's description of the service on the claim.
2. For services provided via telehealth, not subject enrollees to cost-sharing greater than the same cost-sharing if the service were provided in-person.
3. Provide the same amount of reimbursement for a service rendered via telephone as they would if the service is rendered via video, provided the modality by which the service is rendered (telephone versus video) is medically appropriate for the enrollee.

Following issuance of APL 20-009, providers and others asked the DMHC how providers should bill the services rendered via telehealth and whether APL 20-009 applies to all types of services, including Applied Behavior Analysis, physical therapy and speech therapy, among others.

Coding

This APL is meant to increase uniformity and efficiency with respect to provider billing during the COVID-19 State of Emergency to decrease administrative burdens on providers and plans. Accordingly, during the COVID-19 State of Emergency, when a provider delivers a service via telehealth that the provider would normally deliver in-person, the provider should document and bill the service(s) as follows:

- Thoroughly document the visit as if the visit had occurred in person.
- Use the CPT codes for the particular services rendered.

¹ This APL does not apply to Medicare Advantage or Medi-Cal Managed Care products.

² APL 20-009 can be found by clicking on this [link](#).

- Use Place of Service “02” to designate telehealth.
- Use modifier 95 for synchronous rendering of services or GQ for asynchronous.

Types of Services That Can Be Provided Via Telehealth

During the COVID-19 State of Emergency, a health plan may not exclude coverage for certain types of services or categories of services simply because the services are rendered via telehealth, if the enrollee’s provider, in his/her professional judgment, determines the services can be effectively delivered via telehealth. For example, a health plan may not categorically exclude coverage for Applied Behavioral Analysis services delivered via telehealth (video or telephone) during the State of Emergency.

Likewise, during the COVID-19 State of Emergency a health plan may not place limits on covered services simply because the services are provided via telehealth if such limits would not apply if the services were provided in-person. For example, if a health plan allows an enrollee to receive a particular covered service up to three times per week if the enrollee receives the service in-person, the health plan may not limit the service to only once per week if the service is delivered via telehealth.

Providers Who May Render Telehealth Services

The Department has heard from providers and enrollees that health plans are requiring their enrollees to access services through the plans’ contracted telehealth vendor (e.g., Teledoc) rather than covering telehealth services delivered by providers who have typically delivered services to the enrollees in person. During the COVID-19 State of Emergency, a health plan may not require enrollees to use the plan’s telehealth vendor, or a different provider from the one the enrollee typically sees, if the enrollee’s provider is willing to deliver services to the enrollee via telehealth and the enrollee consents to receiving services via telehealth.

Frequently Asked Questions

Attached to this All Plan Letter is a “Frequently Asked Questions” document which provides answers to common questions the Department has received regarding the provision of telehealth services during the State of Emergency.

If you have questions regarding this APL, please contact Sarah Ream, Acting General Counsel, at (916) 324-2522 or via email at sarah.ream@dmhc.ca.gov.