



North Sound BH-ASO

2021 E. College Way, Suite 101, Mt. Vernon, WA 98273

Phone: (360) 416-7013 Fax: (360) 899-4754

www.nsbhaso.org

North Sound BH-ASO Memorandum 2021-04

DATE: 05/05/2021

TO: North Sound BH-ASO Provider Network, North Sound BH-ASO Technical Group

FROM: Margaret Rojas, Assistant Director

RE: Changes to Telehealth Reporting

To all Providers and Technical Group:

This numbered memorandum is to inform you of important changes to telehealth reporting. Beginning **July 1st, 2021**, the following changes will go into effect:

- The CR modifier will only be used to indicate that a service was provided via telephone, and not other telehealth technologies, during the remainder of the COVID-19 PHE.
- Non-HIPAA compliant audio-video platforms, such as Skype and FaceTime, will no longer be permitted. All video chat platforms must be HIPAA-compliant, which means that they will meet criteria as “telemedicine,” and can be billed using the GT modifier regardless of the status of the COVID-19 Public Health Emergency.
- Texting and email are not to be used for service delivery. They can be used only for virtual check-ins using the HCPCS code G2012.

The reason for these changes is to ensure that service utilization data reflects the type of telehealth technology by which the service is provided, in addition to the service itself. There are two primary benefits to this:

(1) By limiting the application of the CR modifier to telephone-administered services, utilization of telephone/ audio-only technology can be tracked separately from the use of audio-video platforms. This data will provide useful information about what services are most frequently provided with which technologies, and among whom.

(2) By limiting video chat platforms to only those that are HIPAA-compliant, patient confidentiality is better protected and the service can be categorized as telemedicine. Since telemedicine services have been reimbursed at parity prior to the pandemic, these services can continue to be provided even when the PHE is over.

HCA continues to provide Zoom licenses to providers so there is ample opportunity to use a HIPAA-compliant platform for services provided over video chat. Whatever platform you utilize, it must be HIPAA-compliant.

Resources:

Apple Health (Medicaid) Behavioral Health Policy and Billing During the COVID-19 Pandemic(FAQ): [Policy effective July 1, 2021](#)

WEB link: https://www.hca.wa.gov/assets/billers-and-providers/behavioral-health-policy-and-billing-COVID-19_0.pdf

Zoom Licenses: [Request a Zoom license](#)

Cc: NS BH-ASO Team