



**Louisiana Department of Health
Health Plan Advisory 20-7
March 20, 2020**

**Telemedicine/Telehealth Facilitation of Mental Health Rehabilitation Services
During the COVID-19 Declared Emergency**

The Louisiana Department of Health (LDH) acknowledges the need for the continued facilitation of mental health rehabilitation (MHR) services during the COVID-19 declared emergency. As in-person intervention is the only approved method for providing MHR services under normal circumstances, an allowance to deliver these services via an alternate method required approval from the Centers for Medicare and Medicaid Services (CMS). LDH is issuing approval effective for dates of service beginning on or after **March 20, 2020**, which will remain in effect until rescinded by LDH. Louisiana Medicaid encourages the use of and will reimburse telemedicine/telehealth, when appropriate, for rendering MHR services.

General Considerations

Managed care organizations (MCOs) should be aware that telemedicine/telehealth does **not** exempt providers from any of the service requirements or record keeping as set forth in the [Medicaid Behavioral Health Services Provider Manual](#). Additional record keeping is mandated for use during the COVID-19 declared emergency as described further in this bulletin. LDH will **not** waive licensure or accreditation requirements for agencies providing MHR services. Providers must meet agency and staff qualifications and requirements for delivering MHR services, as established in the Medicaid Behavioral Health Services Provider Manual. Licensed mental health practitioners providing services in MHR agencies must also follow rules and regulations established by their respective professional licensing boards. While program requirements for the number or percentage of face-to-face contacts for MHR services may be met with the use of telehealth, these temporary measures still require adherence to other requirements that apply to the service delivered, as they would when delivered in-person.

Services must be medically necessary to promote the maximum reduction of symptoms and restoration to both child and adult recipients, as determined by a physician or a fully licensed mental health professional (LMHP). MHR services include the following Medicaid reimbursable services for all levels of staffing (licensed and non-licensed staff):

- Community Psychiatric Support and Treatment (CPST);
- Psychosocial Rehabilitation (PSR);

- Crisis Intervention (CI);
- Assertive Community Treatment (ACT);
- Functional Family Therapy (FFT) and Functional Family Therapy-Child Welfare (FFT-CW);
- Homebuilders®; and
- Multi-Systemic Therapy (MST).

When using telemedicine/telehealth, providers are expected to follow these guidelines:

- Confidentiality still applies for services delivered through telemedicine/telehealth. The session must not be recorded without permission from the recipient or authorized representative.
- Develop a back-up plan (e.g., phone number where recipient can be reached) to restart the session or to reschedule it, in the event of technical problems.
- Develop a safety plan that includes at least one emergency contact and the closest ER location, in the event of a crisis.
- Verify recipient's identity, if needed.
- Providers need the permission of the recipient and the recipient's parent or legal guardian (and their contact information) prior to initiating a telemedicine/telehealth service with the recipient if the recipient is 18 years old or under.
- The recipient must be informed of all persons who will be present at each end of the transmission and the role of each person.
- Recipients may refuse services delivered through telehealth.
- It is important for the provider and the recipient to be in a quiet, private space that is free of distractions during the session.

Providers of evidence-based practice (EBP) services should consult national training organizations (such as FFT, LLC; MST Inc.; and IFD) on guidance for adapting the EBP model for use in a telemedicine/telehealth situation. MCOs shall consult with these same national training organizations to ensure EBP providers are not adversely affected for adhering to guidance pertinent to their respective models during the COVID-19 emergency.

Health plans must ensure that interpretive services, including sign language, are provided as necessary at no cost to the recipient.

Communication Requirements

During this COVID-19 declared emergency, MCOs should encourage the delivery of MHR services via telemedicine/telehealth communications. Providers offering services via telemedicine/telehealth must use a secure, HIPAA-compliant platform, if available. If not available, providers may use everyday communication technologies, including audio-only delivery of telemedicine/telehealth services (e.g. telephone) or use of videoconferencing (e.g. Skype, FaceTime) programs that have reasonable security measures, with each recipient's permission. Audio-only delivery is allowed only in situations where an audio/video system is not available or not feasible. Although a combined audio/video system is preferred, LDH is allowing MHR providers to practice telemedicine/telehealth through telephonic communications **when**

appropriate. Texting and emails are not approved forms of telemedicine/telehealth. At minimum, there must be an audio connection. Providers must adhere to all telemedicine/telehealth-related requirements of their professional licensing board.

There is currently no formal limitation on the originating site (i.e., where the recipient is located) and this can include, but is not limited to, a healthcare facility, a school or the recipient's home. Regardless of the originating site, providers must maintain adequate medical documentation to support reimbursement of the visit.

Assessments and Re-evaluations

MCOs shall allow telemedicine/telehealth for conducting MHR assessments by LMHPs. LDH has requested CMS approval to **extend** re-evaluation due dates until the end of the COVID-19 declared emergency and will update this guidance once approved.

Documentation

Progress Notes

Providers should record all aspects of telephonic and/or face-to-face encounters in the member's clinical record, including, but not limited to the following:

- Name of recipient and any others present/participating.
- Dates and time of service contacts (include both start and stop times).
- Content of each delivered service, including the reason for the contact describing the goals/objectives addressed during the service, specific intervention(s), progress made toward functional and clinical improvement.
- Specific intervention(s) provided, including any units of service provided.
- Service location for each intervention. ***It must be documented that the service is being conducted via telemedicine/telehealth. For use of an audio-only system, the rationale for employing an audio-only system must be documented in the clinical record.***
- Crisis plan, ***including any changes related to COVID-19 risks.***
- ***Any new treatment plan interventions, goals and objectives related to treatment and/or COVID-19-related risks.***
- ***Any referral of members to healthcare providers for further screening, testing or treatment of COVID-19 symptoms or history.***
- ***Document a back-up plan (e.g., phone number where recipient can be reached) to restart the session or to reschedule it, in the event of technical problems.***
- ***Document a safety plan that includes at least one emergency contact and the closest ER location, in the event of a crisis.***
- ***Document verification of the recipient's identity, if needed.***
- ***Document the recipient is informed of all persons who will be present at each end of the transmission and the role of each person.***
- ***Document if recipient refuses services delivered through telehealth.***

- ***Providers need the permission of the recipient and the recipient's parent or legal guardian (and their contact information) prior to initiating a telemedicine/telehealth service with the recipient if the recipient is 18 years old or under.***
- Name and functional title of person making record entry and providing service.

Documents Requiring Recipient Signature

Providers must verbally review and discuss the documents requiring recipient signature (e.g. treatment plan, member choice form) with the recipient/recipient's family during the telemedicine/telehealth visit. The provider will be required to indicate the recipient/recipient's family participation, if appropriate, and agreement, then document as such including the date and time of the meeting.

Staff Supervision

MCOs shall require that providers continue staff supervision as dictated in the [Medicaid Behavioral Health Services Provider Manual](#). Supervision may follow the same guidelines as service delivery with regard to the manner of communication. Supervision must use a secure, HIPAA-compliant platform, if available. If not available, providers may use everyday communication technologies, including audio-only supervision (e.g. telephone) and use of videoconferencing (e.g. Skype, FaceTime) programs that have reasonable security measures. Audio-only delivery is allowed only in situations where an audio/video system is not available or not feasible. Texting and emails are not approved forms of supervision. At minimum, there must be an audio connection. These temporary measures still require adherence to other requirements that apply to staff supervision.

Authorizations

MCOs shall not require an addendum to an existing prior authorization for services to be eligible for telehealth delivery. Requirements for reimbursement are otherwise unchanged from the [Medicaid Behavioral Health Services Provider Manual](#).

MCOs shall **extend existing** prior authorizations (PA) for MHR services for the same duration as the previously authorized units until the end of the COVID-19 declared emergency. New requests should follow standard processes in place with the recipient's MCO.

Billing and Reimbursement

For these services, MCOs shall require the providers to bill the procedure code (HCPCS codes) with modifier "95," as well as Place of Service "02" when delivering the service through telemedicine/telehealth. Reimbursement for visits delivered via telemedicine/telehealth is similar to in-person visits, subject to any terms and conditions in provider contracts with Medicaid managed care entities. Reimbursement will be the same as the MHR community in person rate.

MCOs must update their claims processing systems by **March 27, 2020**. Before that date, providers may continue to submit claims and MCOs will recycle with no action needed by the provider. A list of relevant procedure codes is included below. Providers must indicate place of service 02 and must append modifier 95.

Codes	Description	Place of Service	Modifiers	Unit	Age HA = Child HB = Adult	Master's Level (HO)	Bachelor's Level (HN)	Less than Bachelor's (HM)	Other Per Diem
H0036	CPST - INDIVIDUAL COMMUNITY	02	U8, 95	15 min	0+	\$20.28	\$16.85		
H0036	CPST - HOMEBUILDERS	02	HK, 95	15 min	0+	\$37.03	\$30.61		
H0036	CPST - FUNCTIONAL FAMILY THERAPY	02	HE, 95	15 min	0+	\$38.55	\$31.70		
H0036	CPST - PSH INDIVIDUAL COMMUNITY	02	TG, U8, 95	15 min	0+	\$21.30	\$17.70	\$17.70	
H0039	ACT - NON PHYSICIAN PER DIEM	02	95	Day	18-20	\$151.11	\$112.63	\$86.04	
H0039	ACT - PHYSICIAN PER DIEM	02	AM, 95	Day	18-20				\$373.88
H0039	ACT - 1ST MONTH IF ENROLLED 1-10TH DAY OF MONTH	02	U1, 95	Month	21+				\$1,100.00
H0039	ACT - 1ST MONTH IF ENROLLED 11-20TH DAY OF MONTH	02	U2, 95	Month	21+				\$900.00
H0039	ACT - 1ST MONTH IF ENROLLED 21-31ST DAY OF MONTH	02	U3, 95	Month	21+				\$750.00
H0039	ACT - SUBSEQUENT MONTHS	02	95	Month	21+				\$1,100.00
S9485	CRISIS INTERVENTION PER DIEM	02	95	Day	0-20	\$353.65	\$353.65	\$278.05	
S9485	CRISIS INTERVENTION PER DIEM	02	95	Day	21+	\$353.65	\$353.65	\$278.05	
H2011	CRISIS INTERVENTION FOLLOW UP	02	95	15 min	0-20	\$31.69	\$31.69	\$23.17	
H2011	CRISIS INTERVENTION FOLLOW UP	02	95	15 min	21+	\$31.69	\$31.69	\$23.17	
H2017	PSR - INDIVIDUAL COMMUNITY	02	U8, 95	15 min	0+	\$12.67	\$12.67	\$12.67	
H2017	PSR - PSH INDIVIDUAL COMMUNITY	02	TG, U8, 95	15 min	0+	\$12.67	\$12.67	\$12.67	
H2033	MULTI SYSTEMIC THERAPY	02	95	15 min	0-20	\$36.01	\$30.23		

Resources

MCOs may find more information about the coronavirus (COVID-19), including tips and resources for healthcare providers, by visiting <http://ldh.la.gov/Coronavirus>. Specific information for providers is located here: <http://ldh.la.gov/index.cfm/page/3880>.