

**Managed Care Operations Memorandum**  
**General Operations**  
**MCOPS Memo # 04/2020-009**

**Date:** April 15, 2020

**Subject:** Telemedicine Guidelines Related to COVID-19

**To:** Physical Health HealthChoices Managed Care Organizations (PH-MCOs) –  
Statewide

**From:** Laurie Rock, Director, Bureau of Managed Care Operations, Office of Medical  
Assistance Programs

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**Purpose:**

The Office of Medical Assistance Programs (OMAP) is issuing this Operations Memorandum to offer clarification regarding the coverage of telemedicine services rendered to Physical HealthChoices members.

**Background:**

On March 6, 2020, Governor Wolf issued an emergency [disaster declaration](#) in response to the presence of the COVID-19 coronavirus in Pennsylvania. Pursuant to this disaster declaration, the Department of Human Services (DHS) issued [Provider Quick Tip #229](#) and [Managed Care Operations Memo 03/2020-03](#) related to telemedicine. This Managed Care Operations Memo updates the information included in Managed Care Operations Memo 03/2020-03.

The Office for Civil Rights of the Department of Health and Human Services has announced that during the COVID-19 pandemic it will exercise its enforcement discretion with respect to compliance with the Health Insurance Portability and Accountability Act (HIPAA) [rules](#). Practitioners may provide services via applications that allow for video chats, including Apple FaceTime, Facebook Messenger video chat, Google Hangouts video, Zoom, or Skype. If a provider chooses to use a non-public facing audio or video communication product, there will not be a penalty for noncompliance with the HIPAA rules when a provider acts in good faith in the provision of services using telemedicine.

PH-MCOs may pay out-of-state providers as out-of-network without the need for the provider to enroll in the Medical Assistance (MA) Program. These out-of-state non-participating providers must still be licensed to practice in Pennsylvania. The Pennsylvania

Department of State issued [guidance](#) advising out-of-state providers that they can apply for licensure in Pennsylvania and receive expedited review of their application if they are licensed in good standing in another state for the purpose of rendering services to Pennsylvanians via telemedicine.

## **Discussion:**

### **Coverage of Telemedicine Services Related to COVID-19:**

PH-MCOs may pay for services rendered via telemedicine to a member who is remotely located from the rendering provider, such as at their home, in a nursing facility, or in an alternative service site. Telemedicine services may be provided by any means that allows for two-way, real time interactive communication, such as through audio/video conferencing. During the period of the emergency disaster declaration, telephone-only services may be utilized in situations where video technology is not available. Text-only messaging does not constitute a method of rendering services via telemedicine.

Pennsylvania's MA fee-for-service program is covering services provided via telemedicine rendered under the following circumstances:

- The service is rendered by one of the following provider types:
  - 01: Inpatient Facility – **ONLY** for Specialty Code 183 (Hospital Based Medical Clinic)
  - 05: Home Health – **ONLY** for face-to-face initial certification and recertification visits **(Added 4-9-2020)**
  - 06: Hospice – **ONLY** for face-to-face initial certification and recertification visits **(Added 4-9-2020)**
  - 08: Clinic
  - 09: Certified Registered Nurse **(Expanded 4-9-2020)**
  - 11: Mental Health/Substance Abuse – **ONLY** for Specialty Code 116 (Licensed Clinical Social Worker). Guidance issued by the Office of Mental Health and Substance Abuse Services applies to this provider type and may include requirements in addition to those included in this Ops Memo. **(Added 4-9-2020)**
  - 14: Podiatry **(Added 4-9-2020)**
  - 16: Nursing **(Added 4-9-2020)**
  - 17: Therapist – Guidance issued by the Office of Child Development and Early Learning applies to this provider type and may include additional requirements. **(Expanded 4-9-2020)**
  - 19: Psychologist – Guidance issued by the Office of Mental Health and Substance Abuse Services applies to this provider type and may include additional requirements. **(Added 4-9-2020)**

- 20: Audiologist – **ONLY** for Specialty Code 592 (Early Intervention Services) **(Added 4-9-2020)**
- 21: Case Manager – Guidance issued by the Office of Mental Health and Substance Abuse Services applies to this provider type and may include additional requirements. Guidance issued by the Office of Child Development and Early Learning applies to this provider type and may include additional requirements. **(Added 4-9-2020)**
- 27: Dentist – **ONLY** for Procedure Codes D0140 (limited oral evaluation) and D9995 (teledentistry – synchronous, real-time encounter) **(Added 4-9-2020)**. Please refer to [Provider Quick Tip # 237](#) for additional guidance.
- 31: Physician (Physician’s Assistants may provide services under the usual direction of their supervising physician)
- 33: Certified Nurse Midwife

- The service is rendered in conformance with the full description of the procedure code, in a clinically appropriate manner, and to the extent that it would have been rendered if the visit had occurred in person.

**Next Steps:**

MCOs must cover services rendered via telemedicine at least to the extent to which the services are covered in the fee-for-service delivery system. MCOs should disseminate information to their members and providers about coverage of telemedicine services and work to ensure that members and providers are aware of the ways in which they may access these services. MCOs should instruct providers to bill for services as they would have billed if the services had been rendered in-person. MCOs should map the place of service as follows, documenting in the notes that the service was provided via telemedicine:

- Place of Service 02 (Telehealth) should be coded as Place of Service 11
- Place of Service 19 (Off-Campus Hospital) should be coded as Place of Service 22
- Place of Service 20 (Urgent Care) should be coded as Place of Service 11

**Obsolete:**

This OPS Memo supersedes previously issued OPS Memo 03/2020-003 and remains in effect until further notice.

**Attachment:**

N/A