

**Washington Apple Health (Medicaid)**

# **Telemedicine Policy and Billing**

**January 1, 2023**

## Disclaimer

Every effort has been made to ensure this document's accuracy. If an actual or apparent conflict between this document and a Health Care Authority (HCA) rule arises, the rule applies.

HCA will update this document on an as-needed basis. Due to the nature of content change on the internet, we do not fix broken links in past versions of our documents. If you find a broken link, please check the most recent version of the document. If this is the most recent version, please notify us at [askmedicaid@hca.wa.gov](mailto:askmedicaid@hca.wa.gov).

## About this document

This publication takes effect **January 1, 2023**, and supersedes earlier versions.

HCA is committed to providing equal access to our services. If you need an accommodation or require documents in another format, please call 1-800-562-3022. People who have hearing or speech disabilities, please call 711 for relay services.

Washington Apple Health means the public health insurance programs for eligible Washington residents. Washington Apple Health is the name used in Washington State for Medicaid, the children's health insurance program (CHIP), and state-only funded health care programs. Washington Apple Health is administered by the Washington State Health Care Authority.

**Note:** Refer to Apple Health (Medicaid) program guides on HCA's [website](#) for program-specific telemedicine policy and information.

## How can I get HCA Apple Health provider documents?

To access provider alerts, go to HCA's [provider alerts webpage](#).

To access provider documents, go to HCA's [provider billing guides and fee schedules webpage](#).

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## Further billing guidance

The managed care organizations also have their specific billing instructions at the links below:

- [Molina Healthcare](#)
- [Coordinated Care](#)
- [United Health Care](#)
- [Community Health Plan of Washington](#)
- [Amerigroup](#)

## Confidentiality toolkit for providers

The [Washington State Confidentiality Toolkit for Providers](#) is a resource for providers required to comply with health care privacy laws. To learn more about the toolkit, visit the [HCA website](#).

## What has changed?

The table below briefly outlines how this publication differs from the previous one. This table is organized by subject matter. Each item in the *Subject* column is a hyperlink that, when clicked, will take you to the specific change summarized in that row of the table.

Subject	Change	Reason for Change
<a href="#">Client eligibility</a>	Added section	To conform to HCA billing guide publishing standards and improve usability
<a href="#">Modifier 95 and distinguishing between facility/nonfacility</a>	Added a box stating that using modifier 95 and distinguishing between facility/nonfacility are not applicable for behavioral health providers who use the guides listed	Not a policy change. Added to clarify policy.

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## Definitions

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This section defines terms used in this document.

**Audio-only telemedicine** – The delivery of health care services using audio-only technology, permitting real-time communication between the client at the originating site and the provider, for the purposes of diagnosis, consultation, or treatment.

**Distant site** – The site at which a physician or other licensed provider, delivering a professional service, is physically located at the time the service is provided through telemedicine.

**Face-to-face** – The client could be receiving the care in person or via audio-visual technology.

**Facility** – See the *Site-of-Service Payment Differential* section in HCA's Physician-related services/Health care professional services billing guide.

**Hospital** – A facility licensed under chapter 70.41, 71.12, or 72.23 RCW.

**In person** – The client and the provider are in the same location.

**Medicaid agency or agency** – The Washington State Health Care Authority.

**Medically necessary** – See [WAC 182-500-0070](#).

**Nonfacility** – See the *Site-of-Service Payment Differential* section in HCA's Physician-related services/Health care professional services billing guide.

**Originating site** – The physical location of a client receiving health care services through telemedicine.

**Store and forward technology** – Use of an asynchronous transmission of a covered person's medical or behavioral health information from an originating site to the health care provider at a distant site which results in medical or behavioral health diagnosis and management of the covered person and does not include the use of audio-only telephone, facsimile, or email.

**Telemedicine** – The delivery of health care services using interactive audio and video technology, permitting real-time communication between the client at the originating site and the provider, for the purpose of diagnosis, consultation, or treatment. Telemedicine includes audio-only telemedicine, but does not include any of the following services:

- Email and facsimile transmissions
- Installation or maintenance of any telecommunication devices or systems
- Purchase, rental, or repair of telemedicine equipment
- Incidental services or communications that are not billed separately, such as communicating laboratory results

## Telemedicine

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### Introduction to telemedicine

Before 2020, the Health Care Authority (HCA) had been encouraging and allowing healthcare providers to provide telemedicine options for HCA clients for several years. In response to the COVID-19 pandemic, HCA, working with Apple Health (Medicaid) managed care organizations, expanded the use of a variety of telemedicine technologies to meet the health care needs of clients, families, and providers. In the health care community, the words telehealth and telemedicine are often used interchangeably. However, for Apple Health, telemedicine is defined in a very specific way. See [Definitions](#).

### Best Practices

When conducting telemedicine services, it is important to ensure that the standard of care for telemedicine is the same as that for an in-person visit, providing the same health care service. Refer to the [Department of Health](#) for requirements from various commissions (e.g., Medical Commission, Nursing Commission, etc.).

Best practices may include, but are not limited to, the following:

- Consider the client's resources when deciding the best platform to provide telemedicine services.
- Test the process and have a back-up plan; connections can be disrupted with heavy volume. Communicate a back-up plan in the event the technology fails.
- Introduce yourself, including what your credential is and what specialty you practice. Show a badge when applicable.
- Ask the client their name and verify their identity. Consider requesting a photo ID when applicable/available.
- Inform clients of your location and obtain the location of clients. Include this information in documentation.
- Inform the client of how the client can see a clinician in-person in the event of an emergency or as otherwise needed.
- Inform clients they may want to be in a room or space where privacy can be preserved during the conversation. Explain that personal health information may be disclosed.

## Resources

There are many resources available for providers to get started with telemedicine. The following are examples of resources:

- [Telehealth Collaborative provider training \(required\)](#)
- [Telemental Health Toolkit from NRTRC](#)
- [Washington State Dental Association](#)
- [University of Washington Behavioral Health Institute](#)
- [Washington state Department of Health](#)

Additionally, many professional societies have telemedicine guidelines that may provide valuable care-specific information for health care professionals.

**Note:** Inclusion in the above list does not reflect an endorsement or verification of complete accuracy by HCA.



## Client Eligibility

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Most Apple Health clients are enrolled in an HCA-contracted managed care organization (MCO). This means that Apple Health pays a monthly premium to an MCO for providing preventative, primary, specialty, and other health services to Apple Health clients. Clients in managed care must see only providers who are in their MCO's provider network, unless prior authorized or to treat urgent or emergent care. See HCA's [Apple Health managed care webpage](#) for further details.

**It is important to always check a client's eligibility prior to providing any services because it affects who will pay for the services.**

### How do I verify a client's eligibility?

Check the client's Services Card or follow the two-step process below to verify that a client has Apple Health coverage for the date of service and that the client's benefit package covers the applicable service. This helps prevent delivering a service HCA will not pay for.

#### Verifying eligibility is a two-step process:

- Step 1. **Verify the patient's eligibility for Apple Health.** For detailed instructions on verifying a patient's eligibility for Apple Health, see the Client Eligibility, Benefit Packages, and Coverage Limits section in HCA's [ProviderOne Billing and Resource Guide](#).

If the patient is eligible for Apple Health, proceed to Step 2. If the patient is not eligible, see the note box below.

- Step 2. **Verify service coverage under the Apple Health client's benefit package.** To determine if the requested service is a covered benefit under the Apple Health client's benefit package, see HCA's [Program benefit packages and scope of services webpage](#).

**Note:** Patients who are not Apple Health clients may apply for health care coverage in one of the following ways:

- **Online:** Go to [Washington Healthplanfinder](#) - select the "Apply Now" button. For patients age 65 and older or on Medicare, go to [Washington Connections](#) select the "Apply Now" button.
- **Mobile app:** Download the [WAPlanfinder app](#) – select "sign in" or "create an account".
- **Phone:** Call the Washington Healthplanfinder Customer Support Center at 1-855-923-4633 or 1-855-627-9604 (TTY).
- **Paper:** By completing an *Application for Health Care Coverage (HCA 18-001P)* form. To download an HCA form, see HCA's Free or Low Cost Health Care, [Forms & Publications](#) webpage. Type only the form number into the Search box (Example: **18-001P**). For patients age 65 and older or on Medicare, complete the *Washington Apple Health Application for Aged, Blind, Disabled/Long-Term Services and Support (HCA 18-005)* form.
- **In-person:** Local resources who, at no additional cost, can help you apply for health coverage. See the [Health Benefit Exchange Navigator](#).

## Are clients enrolled in an HCA-contracted managed care organization (MCO) eligible?

**Yes.** Most Medicaid-eligible clients are enrolled in one of HCA's MCOs. For these clients, managed care enrollment will be displayed on the client benefit inquiry screen in ProviderOne.

All medical services covered under an HCA-contracted MCO must be obtained through the MCO's contracted network. The MCO is responsible for:

- Payment of covered services
- Payment of services referred by a provider participating with the plan to an outside provider

**Note:** A client's enrollment can change monthly. Providers who are not contracted with the MCO must receive approval from **both** the MCO and the client's primary care provider (PCP) prior to serving a managed care client.

**Send claims to the client's MCO for payment.** Call the client's MCO to discuss payment prior to providing the service. Providers may bill clients only in very limited situations as described in WAC [182-502-0160](#).

**Note:** HCA continues to pay for the following through fee-for-service (FFS):

- Professional fees for dental procedures using CDT® codes
- Professional fees using CPT® codes only when the provider's taxonomy starts with 12

See the [Dental-Related Services Billing Guide](#) or the [Physician-Related Services/Health Care Professional Services Billing Guide](#), or both, for how to bill professional fees.

## Managed care enrollment

Most Apple Health (Medicaid) clients are enrolled in HCA-contracted MCO the same month they are determined eligible for managed care as a new or renewing client. Some clients may still start their first month of MC eligibility in the FFS program because their qualification for MC enrollment is not established until the month following their Medicaid eligibility determination. Providers must check eligibility to determine enrollment for the month of service.

New clients are those initially applying for benefits or those with changes in their existing eligibility program that consequently make them eligible for Apple Health managed care.

## Checking eligibility

- Providers must check eligibility and know when a client is enrolled and with which MCO. For help with enrolling, clients can refer to the Washington Healthplanfinder's [Get Help Enrolling webpage](#).
- MCOs have retroactive authorization and notification policies in place. The provider must know the MCO's requirements and be compliant with the MCO's policies.

## Clients' options to change plans

Clients have a variety of options to change their plan:

- **Available to clients with a Washington Healthplanfinder account:**  
Go to the [Washington Healthplanfinder website](#).
- **Available to all Apple Health clients:**
  - Visit the [ProviderOne Client Portal website](#):
  - Call Apple Health Customer Service at 1-800-562-3022. The automated system is available 24/7.
  - Request a change online at [ProviderOne Contact Us](#) (this will generate an email to Apple Health Customer Service). Select the topic "Enroll/Change Health Plans."

For online information, direct clients to HCA's [Apple Health Managed Care webpage](#).

## Clients who are not enrolled in an HCA-contracted managed care plan for physical health services

Some Medicaid clients do not meet the qualifications for managed care enrollment. These clients are eligible for services under the fee-for-service (FFS) Medicaid program. In this situation, each Integrated Managed Care (IMC) plan will have Behavioral Health Services Only (BHSO) plans available for Apple Health clients who are not in managed care. The BHSO covers only behavioral health treatment for those clients. Eligible clients who are not enrolled in an HCA-contracted managed care plan are automatically enrolled in a BHSO, except for American Indian/Alaska Native clients. If the client receives Medicaid-covered services before being automatically enrolled in a BHSO, the FFS Medicaid program will reimburse providers for the covered services. Some examples of populations that may be exempt from enrolling into a managed care plan are Medicare dual-eligible, American Indian/Alaska Native, Adoption support and Foster Care alumni.

## Integrated managed care (IMC)

Clients qualified for enrollment in an integrated managed care plan receive all physical health services, mental health services, and substance use disorder treatment through their HCA-contracted managed care organization (MCO).

For full details on integrated managed care, see HCA's [Apple Health Managed Care webpage](#) and scroll down to "Changes to Apple Health managed care."

## Integrated Apple Health Foster Care (AHFC)

Children and young adults in the Foster Care, Adoption Support and Alumni programs who are enrolled in Coordinated Care of Washington's (CCW) Apple Health Foster Care program receive both medical and behavioral health services from CCW.

Clients under this program are:

- Under the age of 18 who are in foster care (out of home placement)
- Under the age of 21 who are receiving adoption support
- Age 18-21 years old in extended foster care
- Age 18 to 26 years old who aged out of foster care on or after their 18th birthday (alumni)

These clients are identified in ProviderOne as  
**"Coordinated Care Healthy Options Foster Care."**

The Apple Health Customer Services staff can answer general questions about this program. For specific questions about Adoption Support, Foster Care or Alumni clients, contact HCA's Foster Care and Adoption Support (FCAS) Team at 1-800-562-3022, Ext. 15480.

## Fee-for-service Apple Health Foster Care

Children and young adults in the fee-for-service Apple Health Foster Care, Adoption Support and Alumni programs receive behavioral health services through the regional Behavioral Health Services Organization (BHSO). For details, see HCA's [Mental Health Services Billing Guide](#), under *How do providers identify the correct payer?*

## American Indian/Alaska Native (AI/AN) Clients

**American Indian/Alaska Native (AI/AN)** clients have two options for Apple Health coverage:

- Apple Health Managed Care
- Apple Health coverage without a managed care plan (also referred to as fee-for-service [FFS])

If an AI/AN client does not choose a managed care plan, they will be automatically enrolled into Apple Health FFS for all their health care services, including comprehensive behavioral health services. See the Health Care Authority's (HCA) [American Indian/Alaska Native webpage](#).

## **What if a client has third-party liability (TPL)?**

If the client has third-party liability (TPL) coverage (excluding Medicare), prior authorization must be obtained before providing any service requiring prior authorization. For more information on TPL, refer to HCA's [ProviderOne Billing and Resource Guide](#).

## Originating and Distant Sites

### Introduction

Telemedicine is an interaction between a healthcare provider who is physically located at the **distant site** and a client who is physically located at the **originating site**. This section provides more information on documentation, payment, and billing requirements attributed to each type of site.

### Documentation requirements

Billing site	Documentation requirement
<b>Distant site</b>	<ul style="list-style-type: none"> <li>• Specification of the telehealth modality that was used (e.g., visit was conducted via HIPAA-compliant real-time audio/visual)</li> <li>• Verification that telemedicine was clinically appropriate for this service</li> <li>• Whether any assistive technologies (e.g., electronic stethoscopes, mobile automatic blood pressure device, etc.) were used</li> <li>• The location of the client</li> <li>• The location of the provider (such as billing office, home, etc.). Include city/state.</li> <li>• The names and credentials (e.g., MD, ARNP, PA, etc.) of all provider personnel involved in the telemedicine visit</li> <li>• The people who attended the appointment with the client (family, friend, caregiver)</li> <li>• The start and end times of the health care service provided by telemedicine or the duration of service when billing is based on time</li> <li>• The consent for care via the modality that was used</li> </ul>
<b>Originating site</b>	<ul style="list-style-type: none"> <li>• Specification of the telehealth modality that was used (e.g., visit was conducted via HIPAA-compliant real-time audio/visual)</li> <li>• If there are staff involved in providing the service list the names and credentials (e.g., MD, ARNP, PA, etc.) of all provider personnel involved in the telemedicine visit</li> <li>• Any medical service provided (e.g., vital signs, weight, etc.)</li> <li>• The start and end times of the health care service provided by telemedicine</li> </ul>

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## Originating site

### Payment

Originating sites that are enrolled with HCA to provide services to HCA clients and bill HCA may be paid a facility fee for infrastructure and client preparation.

**Note:**

- An originating site must be located within the continental United States, Hawaii, District of Columbia, or any United States territory (e.g., Puerto Rico).
- HCA does not pay an originating site facility fee to the client in any setting.

Additionally, HCA does not pay an originating site facility fee in the following situations:

- Audio-only telemedicine
- Store and forward
- If the originating site is:
  - The client's home
  - A hospital (inpatient services)
  - A skilled nursing facility
  - Any location receiving payment for the client's room and board
  - The same entity as the distant site or if the provider is employed by the same entity as the distant site



## Billing

To bill for an originating site facility fee for an eligible service, please use the appropriate billing codes as listed below:

Originating site	Billing
Critical access hospital	Use revenue code 0780 on the same line as HCPCS code Q3014
FQHC or RHC	Use HCPCS code Q3014
Home, or location determined appropriate by the individual receiving service	Not eligible for an originating site reimbursement
Hospital inpatient	Not eligible for an originating site reimbursement
Hospital outpatient	Use revenue code 0780 on the same line as HCPCS code Q3014
Other setting	Use HCPCS code Q3014
Physician or other healthcare professional office	Use HCPCS code Q3014
Skilled nursing facility	Not eligible for an originating site reimbursement

## Distant Site

### Payment

HCA reimburses medically necessary covered services through telemedicine when the service is provided by a Washington Apple Health provider and is within their scope of practice.

For kidney centers or ambulatory surgery centers to bill, either the client or the provider must be physically present at the facility at the time the service was rendered. See [42 CFR 440.90](#) for rules related to clinic services.

**Note:** A distant site must be located within the continental United States, Hawaii, District of Columbia, or any United States territory (e.g., Puerto Rico).

## Billing

The payment amount for the professional service provided through telemedicine by the provider at the distant site is equal to the current fee schedule amount for the service provided. Submit claims for telemedicine services using the appropriate CPT® or HCPCS code for the professional service.

Use place of service (POS) 02 or 10 to indicate that a billed service was furnished as a telemedicine service from a distant site.

Place of service	Description
02	The location where health services and health related services are provided or received through telecommunication technology. Patient is not located in their home when receiving health services or health-related services through telecommunication technology
10	The location where health services and health-related services are provided or received through telecommunication technology. Patient is in their home (which is a location other than a hospital or other facility where the patient receives care in a private residence) when receiving health services or health-related services through telecommunication technology.

When billing with POS 02 or 10:

- Add modifier 95 if the distant site is designated as a nonfacility.
- Nonfacility providers must add modifier 95 to the claim to distinguish them from facility providers and ensure that they receive the nonfacility rate.

**Attention licensed behavioral health agencies (BHA)**—Using modifier 95 and distinguishing between facility/nonfacility are not applicable for behavioral health providers who use the following guides:

- Service encounter reporting instructions (SERI) guide
- Mental health billing guide (Part 2)
- Substance use disorder (SUD) billing guide

HCA discontinued the use of modifier GT for claims submitted for professional services (services billed on a CMS-1500 claim form, when submitting paper claims). Distant site practitioners billing for telemedicine services under the Critical Access Hospital (CAH) optional payment method must use modifier GT. See HCA's [ProviderOne Billing and Resource Guide](#) for more information on submitting claims to HCA. See HCA's [Inpatient Hospital Services Billing Guide](#) for more information on billing for services under the CAH optional payment method.

Follow CMS guidance for modifiers if Medicare is the primary insurance.

## Audio-only telemedicine

### Documentation requirements

In addition to the [telemedicine requirements](#) previously noted, providers must obtain consent before rendering the service per RCWs [74.09.325](#) and [71.24.335](#). Consent must be documented in the client record.

### Procedure codes

Refer to HCA's [Provider billing guides and fee schedules](#) webpage, under *Telehealth*, for a complete list of audio-only telemedicine procedure codes, under *Audio-only telemedicine*.

### Billing

HCA requires providers to bill audio-only services with the appropriate audio-only modifiers (93 or FQ). For services that are partially audio/visual and partially audio-only, a service is considered audio-only if 50% or more of the service was provided via audio-only telemedicine.

Modifier	Description
93	Synchronous Telemedicine Service Rendered Via Telephone or Other Real-time Interactive Audio-Only Telecommunications System: Synchronous telemedicine service is defined as a real-time interaction between a physician or other qualified health care professional and a patient who is located away at a distant site from the physician or other qualified health care professional. The totality of the communication of information exchanged between the physician or other qualified health care professional and the patient during the synchronous telemedicine service must be of an amount and nature that is sufficient to meet the key components and/or requirements of the same service when rendered via a face-to-face interaction.
FQ	For counseling and therapy provided using audio-only telecommunications

Information related to specific service areas and billing guidelines includes the following:

Billing guide/Resource	Modifier
Service Encounter Reporting Instructions (SERI), Substance Use Disorder (SUD) Billing Guide, and Part II of HCA's Mental Health Services Billing Guide	FQ
Part I of HCA's Mental Health Services Billing Guide	93
All other physical health programs	93

**Note:** For more information, see the Apple Health (Medicaid) behavioral health policy and billing during the COVID-19 pandemic (FAQ) under *Telehealth* on HCA's [Provider billing guides and fee schedules webpage](#).

## Store and Forward

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Store and Forward is the transmission of medical information to be reviewed later by a physician or practitioner at a distant site. A client's medical information may include, but is not limited to, video clips, still images, x-rays, laboratory results, audio clips, and text. The physician or practitioner at the distant site reviews the case without the client present.

### Requirements

HCA pays for Store and Forward when all the following conditions are met:

- The visit results in a documented care plan that is communicated back to the referring provider.
- The transmission of protected health information is HIPAA-compliant.
- Written informed consent is obtained from the client that Store and Forward technology will be used and who the consulting provider is.

If the consultation results in a face-to-face visit in person or via telemedicine with the specialist within 60 days of the Store and Forward consult, HCA does not pay for the Store and Forward consultation.

**Note:** The originating site for Store and Forward is not eligible to receive an originating site fee.

## Teledermatology

### Payment

HCA pays for Store and Forward for teledermatology. Teledermatology does not include single-mode consultations by telephone calls, images transmitted via facsimile machines, or electronic mail.

### Coverage

HCA covers the following procedure codes for teledermatology:

E/M service CPT® code	Short description
99241-99243	Office consultation, new or established patient
99251-99253	Initial inpatient consultation
99211-99214	Office or other outpatient visit
99231-99233	Subsequent hospital care

#### Note:

- For information related to the public health emergency and e-consults, see HCA's *Telehealth clinical policy and billing* on HCA's [Provider Billing Guides and Fee Schedules webpage](#), under *Telehealth*.
- Teledermatology requires expedited prior authorization (EPA) # [870001419](#).

## Billing

Teledermatology services provided via Store and Forward telecommunications system must be billed with **modifier GQ**. Bill only the portion(s) rendered from the distant site with modifier GQ. The sending provider bills as usual with the E/M and no modifier. The use of modifier GQ does not alter reimbursement for the CPT® or HCPCS code billed.

You must use POS 02 to indicate the location where health services are provided through Store and Forward technology. POS 02 code does not apply to the originating site.

**Note:** HCA denies claims submitted for Store and Forward services with POS code 02 if modifier GQ is not included.

HCA may perform a post-pay review on any claim to ensure the above conditions were met.