

**A PROVIDER'S GUIDE:  
Telehealth Reimbursement Coverage in Missouri During COVID-19**

Rapid developments with the COVID-19 pandemic have resulted in a set of broad expansions of telehealth policy, including key changes to both public and private payer payment policies, at least for the duration of this emergency period. This guide is meant to help healthcare providers and organizations get up to speed quickly on these changes and key components of telehealth payment in Missouri. Please keep in mind that events and policies are changing rapidly, and that this document will be updated frequently as new information and policies become available/are enacted.

**Missouri**

*Section 1135 Waiver*

On March 25, 2020, CMS approved a waiver of requirements for the state Medicaid program (including the Children's Health Insurance Program) for Missouri effective March 1, 2020

(<https://www.medicaid.gov/state-resource-center/disaster-response-toolkit/federal-disaster-resources/entry/54060>). Changes that impact the delivery of telehealth services are outlined below:

1. Temporarily enroll providers enrolled with another state Medicaid agency or Medicare;
  - a. Reimburse claims from out-of-state providers not enrolled in Missouri's Medicaid program for multiple dates of service;
  - b. Enroll providers in Missouri Medicaid who are not currently enrolled with another state Medicaid agency or Medicare as long as certain requirements are met (NPI, SSN/EIN/TIN, OIG Exclusion Screen, Licensure in at least one state);
2. Suspend prior authorization and medical necessity requirements and extend pre-existing prior authorizations;
3. Extends timeline for fair hearing appeals processes.

*State Actions*

The state has taken a series of actions to respond to the crisis using its new and existing authority (<https://dss.mo.gov/mhd/providers/pages/provtips.htm>). Missouri is:

1. Allowing physicians to see new patients in addition to existing patients through telehealth.
2. Waiving the patient co-payment for any service provided through telehealth.
3. Allowing quarantined providers or those working from alternate sites to bill for telehealth billed as distant site services using the physician's or clinic's provider number.
4. Allowing telehealth providers licensed in other states to provide services as long as they are licensed in the state in which they practice.

In relation to telehealth, Missouri HealthNet clarified the following:

1. Any licensed health care provider, enrolled as a MO HealthNet provider, may provide telehealth services if the services are within the scope of practice for which the health care provider is licensed. The services must be provided with the same standard of care as services provided in person.
2. Telehealth services may be provided to a MHD participant, while at home, using their telephone. The originating site facility fee cannot be billed to MO HealthNet when the originating site is the participant's home.

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3. There is not a separate telehealth fee schedule. Reimbursement to health care providers delivering the medical service at the distant site is equal to the current fee schedule amount for the service provided.
4. Hospitals may bill a facility fee for distant site services provided in their facilities; Rural health clinics may use either their RHC or non-RHC provider number when operating as a distant site.

#### *Teledentistry*

Missouri is encouraging the use of teledentistry and confirmed on March 20th that any licensed dental provider enrolled as a MOHealthNet provider may provide these services as long as they are within the scope of practice for their profession. These services may be provided to an individual in their home using their telephone, but the originating site fee should not be billed when the service is provided in the home.

Relevant approved codes are: D9995 and D9996. Waivers related to teledentistry include:

- The ability to see new patients without an established relationship with the provider.
- Waived co-payments for services provided through teledentistry.
- Allowing quarantined providers to provide these services from their homes using the clinic's provider number.
- Allowing providers who are not licensed in the state of Missouri as long as the teledental provider is licensed in the state where they practice.

#### *E-Prescribing*

On March 19, Missouri HealthNet confirmed that e-prescribing is allowed for all schedules if in compliance with BNDD/DEA requirements (See Related Federal Policy Changes in document outlining federal policy in response to COVID-19). Missouri HealthNet confirmed that requirements of telephoned controlled substance prescriptions are under the purview of BNDD/DEA Requirements and not under the authority of MO HealthNet.

#### *Provider Enrollment*

On March 18, MO HealthNet began expediting enrollment processing into the MO HealthNet program with same-day or overnight approvals of most provider enrollments for licensed practitioners. **Please note that MO HealthNet is also allowing telehealth providers licensed in other states to provide services as long as they are licensed in the state in which they practice.**

#### *Behavioral Health*

During the COVID-19 Emergency, MO HealthNet is allowing all telehealth services to be provided to an individual at home using their telephone. There is not a separate telehealth fee schedule, and reimbursement for behavioral health services at a distant site is the same as the current fee schedule amount for the service provided.

#### *Well-Child Visits*

Effective March 1, 2020, MHD will allow providers to bill and receive reimbursement for EPSDT services including well-child care visits via telehealth (this includes visits over the telephone) during the COVID-19 crisis. Providers should continue to use appropriate modifiers. POS 02 should be included on all telehealth claims.

<p><b>Telehealth Policy Resources:</b></p> <ul style="list-style-type: none"><li>• <a href="#">Medicare Learning Network Booklet – Telehealth Services (2020)</a></li><li>• <a href="#">Medicare Telemedicine Health Care Provider Fact Sheet</a></li><li>• <a href="#">Telehealth Coverage Policies in the Time of COVID-19</a> – Center for Connected Health Policy</li><li>• <a href="#">Billing for Telehealth Encounters: An Introductory Guide to Fee-for-Service</a> – Center for Connected Health Policy</li><li>• March 19, 2020 NCTRC Telehealth and COVID-19 Webinar PowerPoint: <a href="https://www.telehealthresourcecenter.org/wpfd_file/nctrc-covid-19-webinar-mar-19-2020-mwk/">https://www.telehealthresourcecenter.org/wpfd_file/nctrc-covid-19-webinar-mar-19-2020-mwk/</a></li></ul>
<p><b>Telehealth Training and Other Relevant Resources:</b></p> <ul style="list-style-type: none"><li>• <a href="#">Telehealth Coordinator eTraining</a> – California TRC and Northeast TRC</li><li>• <a href="#">Tips for Professional Videoconferencing and Telepresenting</a></li><li>• <a href="#">A Physicians Guide to COVID-19</a> – American Medical Association</li><li>• <a href="#">Telehealth and COVID-19 Toolkit</a> – National Consortium of Telehealth Resource Centers</li><li>• <a href="https://www.ama-assn.org/practice-management/digital/ama-quick-guide-telemedicine-practice">https://www.ama-assn.org/practice-management/digital/ama-quick-guide-telemedicine-practice</a> AMA Quick Guide to Telemedicine in Practice</li></ul>
<p>General Resources related to the provision of Telehealth Services are available on the HTRC website at: <a href="http://heartlandtrc.org/">http://heartlandtrc.org/</a></p> <p>COVID-19 Telehealth Resources are available on the HTRC website at: <a href="http://heartlandtrc.org/covid-19">http://heartlandtrc.org/covid-19</a></p>
<p>National Consortium of Telehealth Resource Centers Resources are available at: <a href="https://www.telehealthresourcecenter.org/">https://www.telehealthresourcecenter.org/</a></p>

## Questions? Contact the Heartland Telehealth Resource Center:

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