Apple Health ABA Policy, Billing and Service Amid COVID-19

Gail Kreiger, Manager, Medicaid Compliance Review and Analytics Medicaid Program Operations and Integrity, Health Care Authority

Becky Peters, Behavioral Health Programs Manager Health Care Authority

Dana Stevens, Director, Clinical Services Northwest Autism Center

Sasha Waring, MD Sr. Behavioral Health Medical Director, Molina Healthcare & Child, Adolescent and Adult Psychiatrist
Webinar Logistics

• The slide deck and resources are attached to the calendar invite.
• All participants are muted.
• This webinar will be recorded.
• Please put questions into the chat box, they will be addressed at the end of the presentation.
Why are we here?

• Aware that usual and customary ways of providing and billing/reporting services may not be feasible
• Different providers will have different capabilities
• Attempting to be as flexible as possible
  – Creating new policies that will allow you to provide medically necessary services
  – Bill or report the encounter with the most appropriate code you determine applicable using the guidance provided
Intent and Ethical Responsibilities

• All providers are **required** to act within their scope of practice
• Continue services keeping with ABA principles and ethical guidelines
• Do no harm
• Keep clients out of ED and families intact
• Responsibility to provide some level of services and support to clients and families during this challenging time
Terminology: Telemedicine verses Telehealth

- **TELEMEDICINE**: HIPAA compliant, interactive, real-time audio and video telecommunications, which is already covered.

- **TELEHEALTH**: Remote services utilizing interactive synchronous (real-time) technology, including audio-only phone communication, for services that can be delivered with functional equivalency to the face-to-face service.
Telemedicine — *has been covered*

**WAC 182-531A-1200**

- Delivery of covered services within the practitioner’s scope of practice to a client at a site other than the site where the provider is located.

- **What is covered**
  - Program supervision when the child is present
    - Certified Behavior Technician's delivery of ABA services to the client, the family, or both
  - Family training, which does not require the child’s presence
Services NOT Paid Under *Telemedicine*

- Email, telephone, and facsimile transmissions
- Installation or maintenance of any telecommunication devices or systems
- Purchase, rental, or repair of telemedicine equipment
- Home health monitoring
Billing for *Telemedicine*

• Report the procedure code (CPT) from the ABA billing guide as you would if the encounter was in person.

• Always document the modality used for delivery in the health care record.
  – If your Electronic Health Record (EHR) allows you to report the encounter as described in ABA billing guide, using the **place of service code “02”**
  – If your EHR doesn’t allow you to use this modifier or POS code, and you cannot get your EHR modified timely to support billing in this way, report the procedure code (CPT) from the billing guide.
• Please see HCA’s brief on how to bill for telemedicine services @ https://www.hca.wa.gov/assets/billers-and-providers/telehealth-brief-for-COVID-03-2020.pdf to prepare claims.

• The Medicaid MCOs are also following this policy.
Telehealth is *Temporary*

- Duration of this public health emergency for COVID-19 pandemic.
- Aware that there are instances when telemedicine is not an option and providers need to use other methods to provide care.
- Apple Health is *temporarily* allowing the certain codes to be used when current practice for providing services is not an option (face to face, telemedicine) and there are extraordinary circumstances involved.
Extraordinary Circumstances

The provider is quarantined at home, the clinic is closed, the client lives remotely and doesn’t have access to the internet or the internet does not support HIPPA compliance, or the circumstances require the provider to utilize a different technology modality to provide behavior health services.
Telehealth enables to you

• Provide ABA treatment to enrolled children and their families who already have ABA orders from a Center of Excellence (COE).

• Covers a variety of technology modalities in lieu of in person visits to support evaluation, assessment and treatment of clients.
  – Such as:
    • on-line digital exchange through a patient portal;
    • telephone calls,
    • Face-Time;
    • Skype;
    • or email.
Providers must:

• Keep complete and accurate documentation according to existing benefit policy requirements.

• Expected to exercise professional judgment and use these technologies only for services that can be *delivered appropriately and effectively via remote communication.*
HIPPA Compliance

• Clients must be informed when using a non-HIPAA compliant technology.

• Their consent to participate using these technologies can be verbal, but the information provided and the verbal consent must be documented and dated.

• Once in-person visits are resumed, the client must sign a consent form that is communicating in writing that the client provided consent to use a platform that could not protect their personal health information.
During the COVID-19 pandemic you can provide any procedure listed in the ABA billing guide using telehealth, except

- Therapeutic behavior services per Diem (H2020),
- Functional analysis for severe maladaptive behavior in a specific setting (0362T),
- Adaptive behavior treatment with protocol modification LBAT and 2 or more techs (0373T).

- The delivery of these services as described in the ABA billing guide do not lend themselves to a telemedicine/telehealth delivery model.
- Another method such as caregiver training will be needed to meet the client/family’s needs.
If current authorization is for H2020 and your agency is temporarily suspending

- If agency provides caregiver training or other ABA code that doesn’t require prior authorization – Do nothing with the authorization

- You are planning to use another ABA service that requires authorization submit the request for the new code via barcode attachment to the current authorization for H2020 with a start date

- These may be done retroactively to March 1, 2020
Other ABA treatment services and codes

- Report the procedure code from the ABA billing guide as you would if the encounter was in person

- Always document the modality used for delivery in the health care record.
Billing *Telehealth Services*

- Use CR (catastrophe) modifier to indicate you are doing services during COVID-19 pandemic

- Please see HCA’s brief on how to bill for telemedicine services @ [https://www.hca.wa.gov/assets/billers-and-providers/telehealth-brief-for-COVID-03-2020.pdf](https://www.hca.wa.gov/assets/billers-and-providers/telehealth-brief-for-COVID-03-2020.pdf) to prepare claims.

- The Medicaid MCOs are also following this policy.
Electronic Health Record

- If your Electronic Health Record (EHR) allows you to report the encounter as described in SERI, using the “CR” modifier or the POS indicator that best describes where the client is, for example “12” is home; do so.

- If your EHR doesn’t allow you to use this modifier and POS codes, and you cannot get your EHR modified timely to support billing in this way, report the procedure code from the ABA billing guide.
Transmission Fee (Q3014)

• **Originating site:**
  – As it applies to ABA, the originating site is the location of the CBT with the client (for supervision) or the location of the caregiver (for caregiver training).

• **Distant site:**
  – A distant site is the physical location where the ABA provider (LBA, LaBA) is located during the telemedicine/telehealth session.
• If you qualify to bill for an **originating site** fee

• 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.

Place of Service (POS)

• Place of Service (POS) is where the client receives the medical service.
  – For example, if the client is at home, use POS 12.

• The MCOs will follow this policy as well.
Prior Authorization

• On how to submit additional documentation visit https://www.hca.wa.gov/billers-providers-partners/prior-authorization-claims-and-billing/prior-authorization-pa
** Please follow the instructions below to submit the additional information requested to this existing request:

1.) Upload the documentation utilizing the ONLINE SUBMISSION.
   - Select Prior Authorization Inquiry to the left of your screen located below the heading of Prior Authorization.
   - Fill in the prompted required information and click ‘Submit’.
   - The next screen will refresh to the original authorization information.
   - In the top left corner, click ‘Add Attachment’
   - This will allow you to upload the pended documentation (including photos and x-rays).
   
   Or

2.) Go to the following link: http://www.hca.wa.gov/billers-providers/providerone-resources
   - Click on Document Submission Cover Sheets and then select PA (Prior Authorization) Pend Forms (under Prior Authorization Request)
   - Type the 9-digit Reference Number from your letter into the Authorization Reference # field and hit Enter (this will expand the barcode shown).
   - Click on the Print Cover Sheet button; choose Yes if you are asked whether you want to allow the document to print.
   - Fax the barcode sheet as the FIRST page, (no coversheet) then the supporting documents to 1-866-668-1214 and the documents will be added to this authorization.
Technology Support

HCA has a limited number of licenses for software which providers may submit an application below:

Go to: https://www.hca.wa.gov/hca-offers-limited-number-no-cost-telehealth-technology-licenses-providers

Note: Does not pay for equipment
Interpreter Services Interim Policy

• HCA is implementing an emergency interim policy change to allow spoken language interpreters to interpret remotely.

• Spoken language interpreters may participate in your healthcare appointments, including telemedicine/telehealth appointments using phone and video methods.

• To use this option, you must include the phone number or video link in the “interpreter notes” field of the request.

• It is your responsibility to provide the needed contact information and to coordinate with the interpreter on any issues or troubleshooting needs.

• Please see HCA’s brief on how to bill for telemedicine services @ https://www.hca.wa.gov/assets/billers-and-providers/telehealth-brief-for-COVID-03-2020.pdf
Example: Northwest Autism Center

• Have been delivering Caregiver Training (97156/97157) via Telemedicine over the past year
• Delivered by LBA via zoom
• Current clients:
  – Switching clients (in-home and H2020)
  – Already completed assessment and treatment plan
  – Documented suspension of current services
  – Documented start date and amount of caregiver training
  – Verbal consent – documented and dated
  – Once resume, signature confirming consent
New clients- Caregiver Training Only

- *Current* diagnosis (including DSM-5 checklist), comprehensive report *and* prescription/order for ABA services from COE

- Intake
  - Includes technology capability of caregiver

- Conduct “abbreviated” assessment
  - Confirms medical necessity and readiness of treatment
• Treatment plan development
  – Dosage including modality
  – Completes treatment plan with only caregiver treatment goals related to child’s assessment
  – Document verbal consent if unable to get written signature
    • Must get signature at later date confirming consent
• Submit for Authorization (Depends on MCO)
• Delivery of Services
• Documentation and data collection
  – Service log; individual or group training
Resources

• HCA FAQ will update as necessary to respond to new information as it develops.

• Washington Association for Behavior Analysts (WABA)
  https://www.washingtonaba.org/
  Note: Will be providing webinar on delivery of ABA services
  Date to be determined.
ABA Specific Resources

- **BHCOE** - [https://bhcoe.org/resources/covid-19-faqs-for-aba-providers/](https://bhcoe.org/resources/covid-19-faqs-for-aba-providers/)
Billing Resources

• HCA’s brief on how to bill for telemedicine services

• ABA program billing guide

• Provider One billing guide
• Physician’s Billing Guide transmission fee (Q3014)
  pages 86-88

Telemedicine / Telehealth Resources

• The Council of Autism Service Providers
  https://casproviders.org/coronavirus-resources/telehealth/

• CASP – Practice Parameters TH for ABA

• Northwest Regional Telehealth Resource Center
  https://nrtrc.org/covid-19
Please send future questions and comments to

HCAABA@hca.wa.gov
Questions and Answers