Telehealth Guidelines Related to COVID-19

On March 15, 2020, the Office of Mental Health and Substance Abuse Services (OMHSAS) issued a Memorandum to offer clarification regarding the ability of providers to render telehealth behavioral health services to Medical Assistance (MA) beneficiaries as a result of the emergency disaster declaration for COVID-19.

This is an unprecedented challenge and Magellan is committed to working with providers on ensuring some flexibility in the highly regulated Medicaid space.

Magellan fully supports the OMHSAS position for the preference for use of telehealth as a delivery method for medically necessary behavioral health services as ordered, referred, or prescribed by a provider or practitioner, that can be delivered effectively when the patient is quarantined, self-quarantined, or self-isolated due to exposure or possible risk of exposure to the COVID-19 virus.

In response to this Memorandum, Magellan is issuing the following guidelines to assist providers with maintaining Compliance. We will update this communication as needed.

March 17, 2020

- Providers utilizing Telehealth in accordance with MA Bulletin OMHSAS-20-02 may do so during this state of emergency and waive the following requirements:
  - Telephone only services may be utilized in situations where video technology is not available.
  - Telehealth will allow the use of telephonic video technology commonly available on smart phones and other electronic devices.
  - Staff trained in the use of the telehealth equipment and protocols to provide operating support are not required to be present while services are being rendered.
  - Staff trained to provide in-person clinical intervention will not be required to be present with the individual while they are receiving services.
• There is no restriction on the type of Practitioner that may provide services through Telehealth. If the individual meets the criteria to render the services in accordance with the level of care specific regulations and bulletins, they may continue to do so during this state of emergency utilizing Telehealth.

• Adherence to all other requirements still apply to the service being delivered as they would when delivered face-to-face. That includes but not limited to the following:
  o For programs reimbursed fee-for-service, providers must continue to adhere to the Unit Definition/ Description on their Magellan Reimbursement Schedule in order to bill a unit of service (i.e. 15 minutes, 30 minutes). Rounding up is still never permitted.
  o For all programs funded as a per diem (per day), the member must continue to be physically present in the facility in order to bill (outside of temporary therapeutic leave).
  o Services must be provided in accordance with the member’s Treatment/ Service/ Recovery Plan.

• Additional documentation requirements when utilizing Telehealth in accordance with these guidelines includes the following:
  o The documentation must indicate the mechanism for how services were delivered (i.e. Telehealth, phone, FaceTime, Skype, etc).
  o The documentation must include the member’s verbal consent to deliver services in this manner.
  o The documentation must include the member’s phone number that was utilized if applicable

• Program requirements for the number or percentage of face-to-face contacts for various behavioral health services may be met with the use of telehealth.

• Any limits on the amount of service that can be provided through telehealth or telephone contact are temporarily suspended (i.e. the 25% annual limit on phone units in Peer Support will not apply during this state of emergency).
• Encounter Forms are only required for face-to-face contact. Thus, any sessions or services provided via Telehealth or telephone are signature exempt.

• Any requirements for face-to-face “Supervision” may be temporarily completed via phone or video. The Supervision note must reflect how the session was conducted.

• In accordance with the OMHSAS Memorandum, providers must submit copies of their Telehealth Attestations to Magellan. Providers who are currently approved for Telehealth should still submit an Attestation to Magellan if they are expanding the use of Telehealth to other services. Additionally, in conjunction with the Attestation, Magellan is asking that providers submit a copy of their Telehealth Plan which outlines how they are implementing Telehealth including but not limited to staff training, supervision and monitoring/oversight.

  ➢ Attestations and Telehealth Plans should be submitted to Crystal Devine at CEDevine@magellanhealth.com

Please note that additional information regarding any limitations on the types of services that can be rendered in this manner will be forthcoming following clarification from OMHSAS. Specifically, Magellan is seeking input on services that involve a Group Component such as Partial Hospital Services, Group Outpatient Therapy, and Site-Based Psychiatric Rehabilitation Services (PRS), to name a few.