



## Telemental Health Services Reimbursement Policy - Medicare

### IMPORTANT NOTE ABOUT THIS REIMBURSEMENT POLICY

*You are responsible for submission of accurate claims. This reimbursement policy is intended to ensure that you are reimbursed based on the procedure code or codes that correctly describe the health care services provided to individuals whose behavioral health benefits are administered by Optum, including but not limited to UnitedHealthcare members. This reimbursement policy is also applicable to behavioral health benefit plans administered by OptumHealth Behavioral Solutions of California.*

*Our behavioral health reimbursement policies may use Current Procedural Terminology (CPT®\*), Centers for Medicare and Medicaid Services (CMS) or other procedure coding guidelines. References to CPT or other sources are for definitional purposes only and do not imply any right to reimbursement. This reimbursement policy applies to all health care services billed on CMS 1500 forms and, when specified, to services billed on the UB-04 claim form and to electronic claim submissions (i.e., 837p and 837i) and for claims submitted online through provider portals. Coding methodology, clinical rationale, industry standard reimbursement logic, regulatory issues, business issues and other input in developing reimbursement policy may apply.*

*This information is intended to serve only as a general reference resource regarding our reimbursement policy for the services described and is not intended to address every aspect of a reimbursement situation. Accordingly, Optum may use reasonable discretion in interpreting and applying this policy to behavioral health care services provided in a particular case. **Further, the policy does not address all issues related to reimbursement for behavioral health care services provided to members. Other factors affecting reimbursement may supplement, modify or, in some cases, supersede this policy. These factors may include, but are not limited to: member's benefit coverage, provider contracts and/or legislative mandates.** It is expected that all participating providers will only bill services included within their existing contract provisions as it relates to procedure coding. Finally, this policy may not be implemented exactly the same way on the different electronic claim processing systems used by Optum due to programming or other constraints; however, Optum strives to minimize these variations.*

*Optum may modify this reimbursement policy at any time by publishing a new version of the policy on this website. However, the information presented in this policy is accurate and current as of the date of publication.*

*Optum uses a customized version of the Claim Editing System known as iCES Clearinghouse to process claims in accordance with our reimbursement policies.*

*\*CPT® is a registered trademark of the American Medical Association*

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#### Applicability

This reimbursement policy applies to all health care services billed on CMS 1500 forms and to electronic claim submissions (i.e., 837p) and for claims submitted online through provider portals. This policy applies to Medicare only, all products, all network and non-network physicians and other qualified health care professionals, including, but not limited to, non-network authorized and percent of charge contract physicians and other qualified health care professionals.

#### Policy Overview

This policy describes Optum reimbursement for Telehealth/Telemedicine behavioral health services. For the purpose of understanding the terms in this policy, Telehealth/Telemedicine occurs when the Physician or Other Qualified Health Care Professional and the patient are not at the same site. Telehealth/Telemedicine services only include live, Interactive Audio and Visual Transmissions of an encounter from one site to another using telecommunications technology. The terms Telemental, Telehealth and Telemedicine are used interchangeably in this policy.

## Reimbursement Guidelines – Telemental/Telehealth/Telemedicine

The Centers for Medicare and Medicaid Services (CMS) have 2 POS codes dedicated to Telehealth Services.

**POS Code 02:** The location where health services and health related services are provided or health related services through telecommunication technology. Patient is not located in their home when receiving health services or health related service through telecommunication technology.

**POS Code 10:** The location where health services and health related services are provided or received, through telecommunication technology. Patient is located 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.

Optum will reimburse for CMS approved Telehealth Services with the use of the telehealth POS code 02 or POS 10, which certifies that the service meets the telehealth requirements.

These Telehealth POS codes do not apply to Originating Site facilities billing a facility fee.

Several conditions must be met for Medicare to make payments for Telemental health services under the Medicare Physician Fee Schedule (MPFS). The service must be on the list of Medicare Telehealth services and meet all of the following additional requirements:

- The service must be furnished via an interactive telecommunications system
- The service must be furnished by a physician or authorized practitioner
- The service must be furnished to an eligible Telehealth individual
- The individual receiving the service must be located in a Telehealth originating site.

Examples of CMS Originating Sites:

- The office of a physician or practitioner
- A Hospitals (inpatient or outpatient)
- A Critical Access hospital (CAH)
- A Rural Health Clinic (RHC)
- A Federally Qualified Health Center (FQHC)
- A hospital-based or critical access hospital-based renal dialysis center (including satellites); NOTE: Independent renal dialysis facilities are not eligible Originating Sites
- A Skilled nursing facility (SNF)
- A Community Mental Health Center (CMHC)
- Patient home\* – Drug treatment and mental health services

\*In addition, Optum recognizes home as an Originating Site as determined by the members benefit plans.

**NOTE:** CPs and CSWs cannot bill for psychiatric diagnostic interview examinations with medical services or medical evaluation and management services under Medicare. They cannot bill or be reimbursed for Current Procedural Terminology (CPT) codes 90792, 90833, 90836, and 90838.

Optum behavioral health considers an eligible provider to deliver Telehealth services as:



- Be legally authorized and hold a valid license to provide mental health and/or substance abuse services in the State where the member is receiving services; and
- Perform services within the scope of his/her license as defined by CMS guidelines and enrolled in the Medicare program.

#### **Eligible Care Providers**

Optum follows CMS policies regarding types of care providers eligible to deliver Telehealth services. These include, for example:

- Physician
- Nurse practitioner
- Physician assistant
- Nurse-midwife
- Clinical nurse specialist
- Clinical psychologist
- Clinical social worker
- Certified Registered Nurse Anesthetists
- Licensed Marriage and Family Therapists
- Mental Health Counselors

Optum will reimburse for CMS approved Telehealth Services with the use of the Telehealth POS 02 or 10, which certifies that the service meets the Telehealth requirements.

#### **Telephone Services**

Optum follows CMS guidelines and considers telephone charges submitted with CPT codes 98966-98968, when billed with POS 02 or 10, because these codes do not involve direct, face to face patient contact and are considered an integral part of other services provided

#### **Opioid Use Disorder Treatment**

Optum follows CMS guidelines effective for services rendered on or after January 1, 2020, and considers office-based treatment for opioid use disorders, G2086-G2088, eligible for reimbursement according to the CMS Physician Fee Schedule (PFS). Please refer to the Opioid Treatment Program Reimbursement Policy.

#### **Definitions**

|                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                 |
|---------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Asynchronous Telecommunication</b>                                                                                                       | Medical information is stored and forwarded to be reviewed at a later time by a physician or health care practitioner at a distant site. The medical information is reviewed without the patient being present. Also referred to as store-and-forward telehealth or non-interactive telecommunication.                                          |
| <b>Interactive Audio and Video Telecommunication or Interactive Audio and Visual Transmissions or Audio-Visual Communication Technology</b> | Medical information is communicated in real-time with the use of Interactive Audio and Video Communications equipment. The real-time communication is between the patient and a distant physician or health care specialist who is performing the service reported. The patient must be present and participating throughout the communication. |
| <b>Originating Site</b>                                                                                                                     | The location of a patient at the time the service being furnished via a telecommunications system occurs.                                                                                                                                                                                                                                       |



|                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                |
|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Telehealth/Telemedicine |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Telehealth services are live, Interactive Audio and Visual Transmissions of a physician-patient encounter from one site to another using telecommunications technologies. They may include transmissions of real-time telecommunications or those transmitted by store-and-forward technology. |
| Questions and Answers   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                |
| 1                       | <b>Q.</b> Will Optum reimburse for new CPT code Q3014 telehealth originating site facility fee?<br><b>A.</b> Consistent with CMS, Optum will not reimburse for CPT code Q3014 if billed with a POS 02 or 10. For POS where Q3014 is reported, report the valid POS code reflecting the location of the patient.                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                |
| 2                       | <b>Q:</b> What are the documentation requirements for Telehealth visits?<br><b>A.</b> For documentation requirements please visit the link <a href="#">Behavioral Health Services Documentation</a>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                |
| 3                       | <b>Q:</b> How does Optum reimburse for phone calls to patients that are not associated with any other service? For example, a provider receives a call from a patient at 2 A.M. The provider is able to handle the situation over the phone without requiring Additional services. On what basis will the visit be denied?<br><b>A:</b> Optum will not reimburse for this service since it did not require direct, in-person patient contact. This service is considered included in the overall management of the patient.<br><b>Note:</b> For Telehealth services rendered in response to the COVID-19 public health emergency, providers should visit COVID-19 information page on <a href="#">Optum Provider Express COVID-19 Provider Information</a> for additional resources. |                                                                                                                                                                                                                                                                                                |
| 4                       | <b>Q:</b> A provider makes daily telephone calls to check on the status of a patient's condition. These services are in lieu of clinic visits. Will Optum reimburse the physician for these telephone services?<br><b>A:</b> No, Optum will not reimburse telephone services, since they do not involve direct, in-person patient contact. These services are considered included in the overall management of the patient.                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                |
| 5                       | <b>Q:</b> Does Optum reimburse website charges for provider groups if their website provides patient education material?<br><b>A:</b> No, Optum will not reimburse for Internet charges since there is no direct, in-person patient contact.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                |
| 6                       | <b>Q:</b> What is the difference between Telehealth services and telephone calls?<br><b>A:</b> Telehealth services are live Interactive Audio and Visual Transmissions of a provider-patient encounter from one site to another using telecommunications technologies. Telephone calls are non-face-to-face medical discussions, between a physician or other healthcare professional and a patient, that do not require direct, in-person contact.                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                |
| 7                       | <b>Q.</b> Will Optum allow a GT modifier if billed for reimbursement with POS 02 or 10?<br><b>A.</b> Optum will allow a GT modifier on distant site for services billed under Critical Access Hospital (CAH) method II on institutional claims, the GT modifier will still be required.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                                                                                                                                                                                                |

Covered Telehealth Services CPT Codes listed below are not intended as exhaustive of all relevant codes

|           |                                         |
|-----------|-----------------------------------------|
| CPT Codes | <a href="#">CMS Telehealth Services</a> |
|-----------|-----------------------------------------|

## Resources

[www.cms.gov](http://www.cms.gov)

American Medical Association, *Current Procedural Terminology (CPT®)* and associated publications and services

Centers for Medicare and Medicaid Services, Physician Fee Schedule (PFS) Relative Value Files

## History / Updates

|                 |                                                                                                                                                                                                                                  |
|-----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| February, 2025  | Anniversary Review/ Added Q&A 1 related to Q3014                                                                                                                                                                                 |
| March, 2024     | Updated Reimbursement Guidelines Section; added CMS Telehealth Code Link                                                                                                                                                         |
| December, 2023  | Updated Reimbursement Guidelines Section                                                                                                                                                                                         |
| October, 2023   | Updated Reimbursement Guidelines Section                                                                                                                                                                                         |
| May, 2023       | Updated Reimbursement Guidelines Section                                                                                                                                                                                         |
| January , 2023  | Anniversary Review<br>Remove GT modifier from Reimbursement Guidelines Section and added Q&A 6                                                                                                                                   |
| September, 2022 | Updated Q&A 1 & 2                                                                                                                                                                                                                |
| August, 2022    | Updated Reimbursement Guidelines Section                                                                                                                                                                                         |
| January, 2022   | 2022 Annual Review<br>Overview section updated<br>Reimbursement Guidelines Section: added POS 10, updated modifier list new codes FQ and FR<br>Definitions Updated                                                               |
| May, 2021       | Anniversary Review; No Updates                                                                                                                                                                                                   |
| January, 2021   | Reimbursement Overview & Guidelines Section revised; POS 02 is required for telehealth services<br>Definitions Section revised<br>Q&A 1 2 & 3 Section updated<br>Supplemental Waiver List 2021 Update                            |
| December, 2020  | Updated On-Line Digital Evaluation and Management Services section; removed deleted codes 98969 and 99444                                                                                                                        |
| April, 2020     | Annual Anniversary Date<br>Reimbursement Guidelines Section: added Patient Home for originating site, added Opioid codes and language,<br>Updated Optum Supplemental Benefit Waiver list<br>Updated Telehealth Covered Code List |
| November, 2019  | Updated Title to policy from Virtual Visits Medicare & Retirement Reimbursement Policy to Telemental Health Services Reimbursement Policy - Medicare                                                                             |
| August, 2019    | Annual Anniversary Date                                                                                                                                                                                                          |
| January, 2019   | Removal of the GT modifier as an acceptable billing practice                                                                                                                                                                     |
| August, 2018    | New                                                                                                                                                                                                                              |

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