MO HealthNet
Telehealth Billing

Dana Bernier, Provider Education
Providers should follow Missouri Revised Statutes, 191.1145, 191.1146, 208.670, and 208.677 when providing telehealth services.
"Provider", the same meaning as the term "health care provider" is defined in section 191.1145, and such provider meets all other MO HealthNet eligibility requirements;

"Health care professional", a physician or other health care practitioner licensed, accredited or certified by the state of Missouri to perform specified health services consistent with state law RSMO 376.1350
The department of social services shall reimburse providers for services provided through telehealth if such providers can ensure services are rendered meeting the standard of care that would otherwise be expected should such services be provided in person. The department shall not restrict the originating site through rule or payment so long as the provider can ensure services are rendered meeting the standard of care that would otherwise be expected should such services be provided in person. Payment for services rendered via telehealth shall not depend on any minimum distance requirement between the originating and distant site. Reimbursement for telehealth services shall be made in the same way as reimbursement for in-person contact; however, consideration shall also be made for reimbursement to the originating site. Reimbursement for asynchronous store-and-forward may be capped at the reimbursement rate had the service been provided in person.
Effective for dates of services on and after January 1, 2019 the MO HealthNet Division (MHD) will reimburse outpatient facilities the telehealth originating site fee at the lesser of the billed amount or the outpatient fee schedule amount of $15.60.

The originating site is where the MO HealthNet participant receiving the telehealth service is physically located for the encounter. Procedure code Q3014 is used by the originating site to receive reimbursement for the use of the facility while telehealth services are being rendered.
Use Place of Service (POS) 02

- Reimbursement to the health care providers delivering the medical service at the distant site is equal to the current fee schedule amount for the service provided. Use the appropriate CPT code for the service along with place of service 02 when submitting telehealth claims for the distant site.
Distant site services provided on school grounds should be billed with place of service 03 and a GT modifier.

Must get consent from parent/guardian to provide telehealth services. Parent/guardian may authorize services via telehealth for a whole school year (RSMo 208.677).
School Statute

208.677. School children, parental authorization required for telehealth. — Prior to the provision of telehealth services in a school, the parent or guardian of the child shall provide authorization for the provision of such service. Such authorization shall include the ability for the parent or guardian to authorize services via telehealth in the school for the remainder of the school year.
The originating site fee and distant site services can be billed by the same provider for the same date of service as long as the distant site is not located in the originating site facility.
Medicare Payment Advisory Commission study of 2009 claims found that Medicare professional fee claims without associated claims for originating-site facility fees were more likely to be associated with unallowable telehealth payments. We analyzed 2014 and 2015 (our audit period) telehealth claims and found that more than half of the professional telehealth claims paid by Medicare did not have matching originating-site facility fee claims. 

[https://oig.hhs.gov/oas/reports/region5/51600058.asp](https://oig.hhs.gov/oas/reports/region5/51600058.asp)
MO HealthNet Requirements

Any and All billing requirements needed to perform and bill for a service apply to Telehealth services.

- Prior Authorizations, pre-certifications, consent forms, etc.
- Check the MO HealthNet online Fee Schedule to ascertain these requirements.
RHC’s

- RHCs, both provider-based and independent, must continue to bill Telehealth services using their non-RHC provider number when operating as an originating site.
- Please watch for a provider bulletin in the near future regarding RHC’s billing for the distant site.
- Use POS 02 when billing the distant site when you use your non-RHC provider number.
- For RHC questions, please contact Christie Masterson at: 573-751-6984 or IRU.Hospital@dss.mo.gov
For dates of service on or after July 1, 2018, the originating site reimbursement rate is $15.39.

Effective for dates of service on or after July 1, 2018, **FQHC providers must bill no more than $16.73** in order to receive the $15.39 maximum reimbursement. The MO HealthNet Division (MHD) will reprocess claims paid for dates of service on or after July 1, 2018. Please check your future remittance advice statements for rate adjustments.

The MHD will reimburse the lower of the provider’s billed charge or the maximum allowable amount for the date of service billed for fee for service claims. Providers may not bill the MHD at a higher rate than they charge their private-pay patients.
Special Notes: FQHC Providers

- FQHC providers must remove originating site charges and payments for Telehealth services from their year-end cost reports.
- FQHC providers must leave the Rendering Provider ID field (24j on CMS-1500) blank on their claims when billing the Q3014 originating site facility charge.
The Telehealth charges and costs, including the depreciation cost for equipment, are not allowed on the FQHC cost report.

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The clinic must have medical records in their clinic for the person being seen to be able to report these charges on their cost report. If the person being seen is not one of the clinic’s patients, all costs will need to be removed from the cost report.

For questions on cost reporting you may contact Cathy Wade at 573-751-7731 or e-mail Cathy.wade@dss.mo.gov or the IRU Clinic e-mail address is IRU.CLINIC@dss.mo.gov
Thank you for attending the webinar

Addressing your Questions:
You may contact Provider Education at MHD.PROVTRAIN@dss.mo.gov or call 573-751-6683

This power point will be posted on the Provider Information Page/Education/Training
https://dss.mo.gov/mhd/providers/education/