

BLUE CROSS VT TELEMEDICINE

March 2023

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POLICIES

TELEMEDICINE

- Corporate Payment Policy (CPP_3)

www.bluecrossvt.org/documents/cpp03-telemedicine-effective-01012023

- No differential between in-person and telemedicine; no differential in copay or deductible.
- Currently, provider must be in-network to trigger benefits (unless authorized b/c no providers in-network)
- Pay for both synchronous and asynchronous (store-and-forward)
- Policy is periodically updated
- Telemedicine Medical Policy – aligns with Payment Policy
- Temporary Telemedicine Policies
 - CPP_34 (IOP/PHP, lactation support) – expiring May 1, 2023, but services moving to CPP_03

AUDIO-ONLY PAYMENT POLICY

- Telephone Only (CPP_24)
- Updated to include AMA guidance on telephone services
- -V3 modifier for
 - PCP billing psychotherapy or pharmacologic mgmt
 - PCP billing E/M code for MHSUD primary diagnosis
 - MHSUD clinician providing services
- -V4 modifier for all other services
- Payment differential for –V4 (75% of in-person rate)
- Reviewed most recently in February 2023; DFR conducting 2-year study, so more to come

BILLING

LOCATION CONSIDERATIONS

- Under our license with BCBSA, we cannot contract with providers who are not physically in VT at the time of service (licensure doesn't matter). However, the “Snow Bird Rule” provides a limited exception. (see next slide for details)
- Claims must be submitted to the Blue Plan where the provider is located at the time of service.
- Generally, the provider should follow licensure/scope of practice requirements of jurisdiction where patient is located.

“SNOW BIRD RULE” TELEHEALTH EXCEPTION

The BCBSA allows for the following limited exception for telehealth contracting:

“Providers that have temporarily relocated outside their original service area and continue to service patients from the original service area for up to six months within a 12-month period. These claims are filed to the provider’s original Par/Host Plan.”

VERMONT ACT NO. 85:

INTERIM TELEHEALTH REGISTRATION

- Sec 17(a) “Notwithstanding any provision of Vermont’s professional licensure statutes or rules to the contrary, through **June 30, 2023**, a health care professional, including a mental health professional, who holds a valid license, certificate, or registration to provide health care services in any other U.S. jurisdiction shall be deemed to be licensed, certified, or registered to provide health care services, including mental health services, to a patient located in Vermont using telehealth; as a volunteer member of the Medical Reserve Corps; or, **for a period not to exceed six months**, as part of the staff of a licensed facility, other health care facility as defined in 18 V.S.A. § 9432, or federally qualified health center, provided the health care professional:
 - (1) is licensed, certified, or registered in good standing in the other U.S. jurisdiction or jurisdictions in which the health care professional holds a license, certificate, or registration;
 - (2) is not subject to any professional disciplinary proceedings in any other U.S. jurisdiction; and
 - (3) is not affirmatively barred from practice in Vermont for reasons of fraud or abuse, patient care, or public safety.”
- **All Interim Telehealth Registrations will expire on June 30, 2023.**

VERMONT ACT NO. 107: PERMANENT TELEHEALTH REGISTRATION

On May 9, 2022, Act 107, which enacts permanent telehealth registration and licensing in Vermont, was signed into law. The telehealth registration and telehealth license authorized by Act 107 will be effective on **July 1, 2023**.

A health care professional, who is licensed in good standing in another state and wishes to provide healthcare in Vermont via telehealth on or after July 1, 2023, will be required to obtain a Telehealth Registration or Telehealth License.

The VT Office of Professional Regulation should have sent a communication to holders of an Interim Telehealth Registration in early 2023 with a reminder about the transition to Telehealth Registrations and Telehealth Licenses and instructions regarding how to obtain a Telehealth Registration or Telehealth License.

FAQS

- Contracted and Office in VT
- Contracted and Office in NH/MA/NY
- Contracted but moving out of state
- Contracted but vacationing out of state
- My patient is moving/vacationing out of state
- Documentation requirements – consent, concerns (e.g., patient wants non-covered treatment or to pay out-of-pocket instead of using insurance)