

### Telehealth's Rapid Adoption In 2020 & Building Sustainable Telehealth Programs for the Future

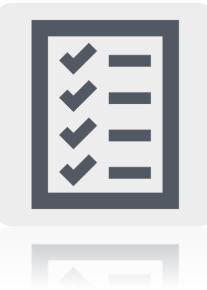
#### Today's Speakers:

- Jordana Bernard, Chief Compliance Officer, innovaTel Telepsychiatry
- Jon Evans, CEO & Founder, innovaTel Telepsychiatry
- Lauren Lashbrook, Director of Strategic Partnerships, innovaTel Telepsychiatry
- Dr. McCray Ashby, Child Psychiatrist, innovaTel Telepsychiatry



### Agenda

- innovaTel Telepsychiatry Overview
- 2020's Impact on Behavioral Health and Substance Use Disorder
- Telehealth's Rapid Adoption
- Overview Telehealth Reimbursement Policies
- Telebehavioral Health Payment Opportunities
- What's Next for Telehealth and Building Sustainable Long-Term Telehealth Programs





# About innovaTel Telepsychiatry

#### Clinician Owned & Operated

innovaTel was founded by a clinical team with 30+ years of experience.

#### **CMMHC Roots**

The Founders started the first CMHC in NW Pennsylvania and through a small SAMSHA grant developed a successful telepsychiatry program.

Psychiatric recruitment and retention was a constant challenge.



STRATEGIC PARTNER

#### Success with Telepsychiatry

Through word of mouth the clinic's adoption & success using telepsychiatry spread quickly the country.

#### Founded in 2014

As a result of the success and need to establish an independent company, innovaTel was founded in April 2014.





### Partnering To Grow Your Team

- innovaTel partners with organizations by offering contracted hours (part-time or full-time) for providers including:
  - Psychiatrists
  - Psychiatric Nurse Practitioners
  - Licensed Clinical Social Workers
- Specialty Patient Populations
- Clinical Partners

- Bi-Lingual
- SMI/SMPI
- Co-Occurring/Dual Diagnosis
- Child & Adolescent
- Geriatric
- Forensic
- Substance Use Disorder

- Community Mental Health Centers
- CCBHCs
- Federally Qualified Health Centers
- Outpatient & Residential Facilities
- Substance Use Disorder Programs
- Health Systems
- The organizations we partner with interview and choose the provider or providers that are joining their team.
- We believe continuity of care is critical in behavioral health. Partnering with innovaTel, the selected clinician becomes a virtual member of the team. Patients will see the same clinician each and every time.



# A Telepsychiatry Partner Focused on SMI & Co-Occurring Patient Populations

We have a thorough screening process for hiring specific to working with SMI population.

Because of our thorough matchmaking process, we are proud to have a 95% clinician retention rate.

innovaTel is also extremely selective with the clinicians we hire, extending offers **to less than 20% of those that apply with us.** 

You **interview and choose** the clinician(s) that will join your team.



innovaTel saw a **71% increase** in the amount of clinicians looking to join our team since March 2020 due to the rapid adoption of telehealth.

We have seen a significant increase in the amount of organizations that are looking for providers with co-occurring experience to treat both mental health and substance use disorder.



# **COVID-19 Resolution: The Hybrid Model**

## **COVID-19** is a crisis for all

especially organizations that serve the most vulnerable populations. Prior to COVID, all patients that innovaTel providers connected with were located in physical clinics.

#### **Evolution**

innovaTel rapidly responded to changing needs in behavioral health and evolved to provide our customers' patients with access psychiatric coverage no matter if they were seen on-site or from their home. Now 90% of patient encounters are occurring in patient homes.



### Increase Access to Care & Reduce No-shows

By mobilizing quickly in partnership with our clinic partners, we were able to provide care to patients who were no longer able to come into a clinic and remove barriers that were historically in place, which resulted in **increased access to care and a reduction in no-shows for our clinic partners.** 

#### The Future is Hybrid

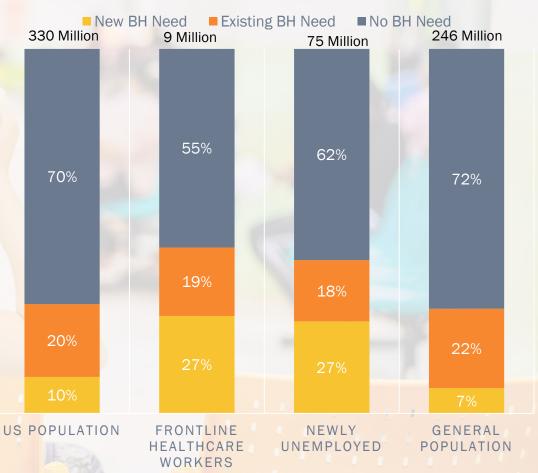
innovaTel believes the future of behavioral health will be a hybrid of patients connecting remotely and coming on-site for appointments based on clinical appropriateness and technology available.



# A Pandemic Within the Pandemic: Increased Demand for BH Services

Nationally, we are seeing an increase in demand for behavioral health treatment.

Historically, the statistic has been **1** in **5** adults in the US may be in need of behavioral health services, and this model is estimating that this could switch to **1** in **3**, that's an additional **35** million people. Impact of COVID-19 on Behavioral Health Across Different Population Segments



Source: McKinsey & Company

https://www.mckinsey.com/industries/healthcare-systems-and-services/our-insights/understanding-the-hidden-costs-of-covid-19spotential-impact-on-us-healthcare#

### **From A Physician's Perspective**



Dr. McCray Ashby, MD

**Director of Medical Integration** 

Child Psychiatrist



# **Challenges & Opportunities**

- Sustainable rates
- Historical funding challenges
- Parity
- Medicare Rates
- CCBHC Status

### **Reimbursement for Telehealth & Other Communication Technology-based Services**

#### Telehealth policies vary by payer and state

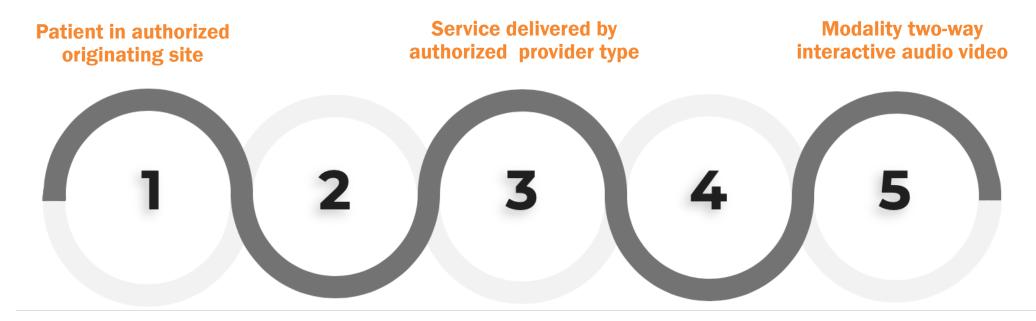
- Medicare
  - Telehealth defined by Section 1834(m) of Social Security Act
  - Communication technology-based services
- Medicaid
  - States & DC determine respective policies
  - 50+ sets of rules
- Commercial Insurance
  - Policies vary by plan & state laws
  - Telehealth "parity" laws (coverage vs payment)



Jordana Bernard, MBA, FATA Chief Compliance Officer innovaTel Telepsychiatry



### Medicare Telehealth Conditions for Payment (Pre-COVID)



Originating site in defined rural geographic area

Service on approved telehealth list

Note: To bill telehealth use POS (02) telehealth, no modifier



§1834(m) of Social Security Act, exceptions for stroke, ESRD, SUDs

## 2018 Enacted Federal Telehealth Legislation

#### **Bipartisan Budget Act of 2018**

- Removed rural geographic restriction for acute stroke, end-stage-renal disease (ESRD)
- Enabled nationwide reimbursement
- Added mobile stroke units, patient's home (ESRD)
- Expanded flexibilities for telehealth in MA plans and ACOs

#### **SUPPORT for Patients and Communities Act**

- Removed rural geographic restriction for SUD services via telehealth
- Enabled nationwide reimbursement
- Added patient's home

Targeted removal of statutory restrictions to...

- Expand access to care
- Enable payment of services to accelerate adoption

# Medicare Communication Technology-Based Services (Pre-COVID)



Each type of service has a unique set of rules for reimbursement

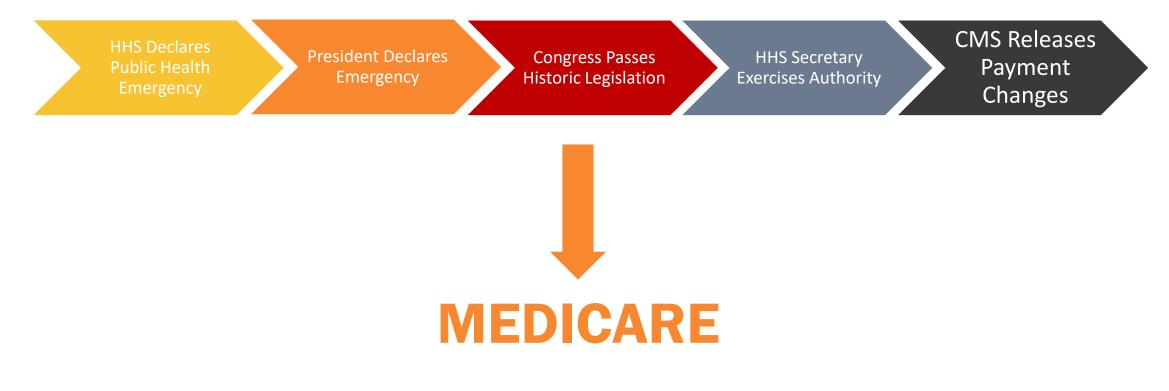
Virtual Check-ins	eVisits	Remote Patient Monitoring
Brief visit	Online patient portal	Non face-to-face
Live video, phone, store	Patient-initiated	Chronic care management
and forward	Established patients	Geography neutral, no
Patient-initiated	Geography neutral, no	setting restrictions
Established patients	setting restrictions	
Geography neutral, no setting restrictions		



### **COVID-19 Pandemic Accelerates Telehealth Policy Reforms**

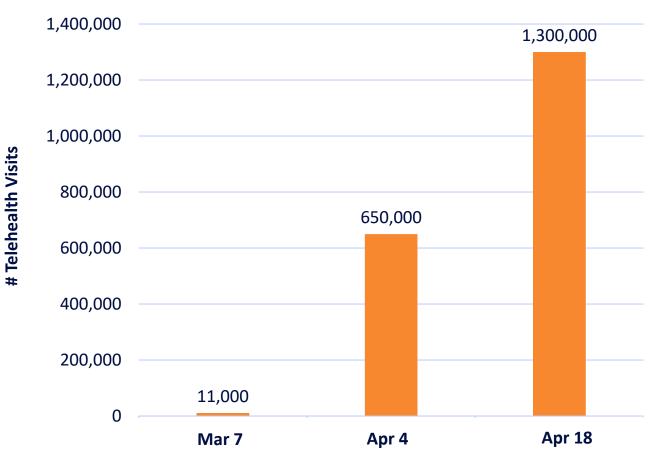


Drives healthcare delivery towards telehealth





### **Medicare Telehealth Visits Increase 100X**

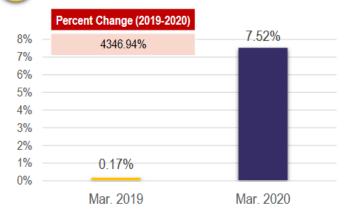




Majority of **States** took action to expand telehealth during the crisis

#### **Commercial Plans**

Volume of Claim Lines, 2019 vs. 2020



Fair Health Monthly Telehealth Regional Tracker / Mar 2020

## Medicare Telehealth Reimbursement Changes COVID-19



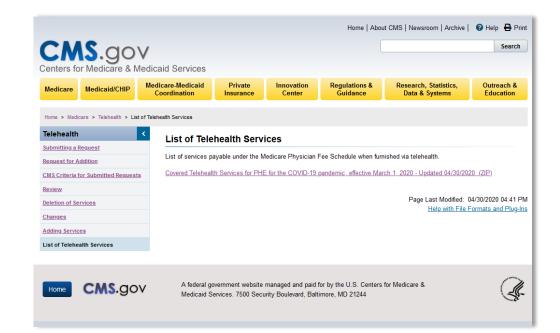
	Telehealth Payment (Pre-PHE)	Telehealth Payment Rules (During PHE)
Location of originating site	Limited to rural areas	No geographic restrictions
Type of originating site	Limited sites, no home	No restrictions, allows home
Eligible providers	Limited to MDs, NPs, LCSWs, few others	Added FQHCs/RHCs, all providers
Approved modalities	Limited, interactive audio-video	Expanded modalities, allowed audio-only / telephone
Approved services	Limited ~100 total covered services	Expanded ~240 total services

\* HHS Office of Civil Rights is exercising enforcement discretion and waiving penalties for HIPAA violations against providers that serve patients in good faith through every day, consumer-grade technologies, such as FaceTime or Skype

## **Medicare Telehealth Services (COVID-19)**

Services to patients in any geographic area, site of care including patient's home

- Outpatient, inpatient, home (DTP, DTC) services
- E/M visits, consultations
- Telebehavioral health, critical care, ED, hospital care, observation, wellness, long-term care
- · Certain telehealth visits by phone
- Providers may waive or reduce cost-sharing
- To bill a telehealth service
  - Use modifier 95, POS code that would have been reported had the service been furnished in person
  - Medicare pays the same as in-person care



https://www.cms.gov/Medicare/Medicare-General-Information/Telehealth/Telehealth-Codes



### Medicare Reimbursement for Other Communication Technology-based Services (COVID-19)



### Virtual Check-ins

Expanded to include both new and established patients

Expanded types of providers eligible to bill

HCPCs codes G2010, G2012

### eVisits

Expanded to include both new and established patients

Expanded types of providers eligible to bill

CPT/HCPCS codes 99421-99423, G2061-G2063

### Remote Patient Monitoring

Expanded to include both new and established patients Expanded to include acute conditions Incident to billing CPT

codes 99453, 99454



### **CY2021 Medicare Physician Fee Schedule**



### **Key Telehealth Policy Changes**

- Makes permanent payment for certain telehealth services
- Extends payment for 60 temporary PHE services through end of 2021
- Creates new permanent payment codes for virtual check-ins, eVisits
- Finalizes other temporary telehealth PHE policy changes
- Implements major changes to outpatient E/M rules and documentation requirements



### **CY2021 Medicare Physician Fee Schedule**



### **Key Telebehavioral Health Policy Changes**

- Makes permanent payment
  - 90853, Group Psychotherapy
  - 99347-99348, Home Visits (treatment of SUDs/co-occurring MH disorders)
- Extends payment through end of 2021
  - 99349-99350, Home Visits (treatment of SUDs/co-occurring mental health disorders)
  - 99281-99285, ED visits
- Creates new permanent payment CPT code G2252, extended virtual check-ins through 2021 (physicians and QHPs)
- Finalized periodic assessments via live video telehealth (OUD treatment services for OTPs)



#### **CY 2021 Medicare PFS Telebehavioral Health Services Billing Codes & Rates**

Code	Medicare Short Descriptor	Facility Rate (Nat. Avg.)	Non-Facility Rate (Nat. Avg.)
90785	Psytx complex interactive	\$13.26	\$15.00
90791	Psych diagnostic evaluation	\$156.32	\$180.75
90792	Psych diag eval w/med srvcs	\$176.56	\$201.68
90832	Psytx w pt 30 minutes	\$68.74	\$77.81
90833	Psytx w pt w e/m 30 min	\$63.51	\$71.18
90834	Psytx w pt 45 minutes	\$91.07	\$103.28
90836	Psytx w pt w e/m 45 min	\$80.25	\$90.02
90837	Psytx w pt 60 minutes	\$134.69	\$152.48
90838	Psytx w pt w e/m 60 min	\$106.77	\$119.33
90839	Psytx crisis initial 60 min	\$128.06	\$145.16
90840	Psytx crisis ea addl 30 min	\$60.71	\$68.74
90845	Psychoanalysis	\$87.23	\$98.05
90846	Family psytx w/o pt 50 min	\$98.40	\$99.10
90847	Family psytx w/pt 50 min	\$101.89	\$102.59
90853	Group psychotherapy	\$24.08	\$27.57
96156	Hith bhv assmt/reassessment	\$86.19	\$97.35
96158	HIth bhv ivntj indiv 1st 30	\$58.97	\$66.65
96159	Hlth bhv ivntj indiv ea addl	\$20.59	\$23.03
96164	HIth bhv ivntj grp 1st 30	\$8.72	\$9.77
96165	Hlth bhv ivntj grp ea addl	\$3.84	\$4.54
96167	HIth bhv ivntj fam 1st 30	\$62.81	\$71.18
96168	Hlth bhv ivntj fam ea addl	\$22.33	\$25.47

Code	Medicare Short Descriptor	Facility Rate (Nat. Avg.)	Non-Facility Rate (Nat. Avg.)
99202	Office/outpatient visit new	\$49.90	\$73.97
99203	Office/outpatient visit new	\$84.44	\$113.75
99204	Office/outpatient visit new	\$137.48	\$169.93
99205	Office/outpatient visit new	\$186.68	\$224.36
99211	Office/outpatient visit est	\$9.07	\$23.03
99212	Office/outpatient visit est	\$36.29	\$56.88
99213	Office/outpatient visit est	\$68.04	\$92.47
99214	Office/outpatient visit est	\$100.49	\$131.20
99215	Office/outpatient visit est	\$147.95	\$183.19
99354	Proing svc o/p 1st hour	\$120.73	\$129.10
99355	Proing svc o/p ea addl 30	\$88.98	\$96.30
99441	Phone e/m phys/qhp 5-10 min	\$36.29	\$56.88
99442	Phone e/m phys/qhp 11-20 min	\$68.39	\$92.82
99443	Phone e/m phys/qhp 21-30 min	\$100.84	\$131.55
G2086	Off base opioid tx 70min	\$287.17	\$394.64
G2087	Off base opioid tx, 60 m	\$280.54	\$351.37
G2088	Off base opioid tx, add30	\$33.85	\$66.65
G0425	Inpt/ed teleconsult30	\$101.19	n/a
G0426	Inpt/ed teleconsult50	\$136.08	n/a
G0427	Inpt/ed teleconsult70	\$200.29	n/a

 New conversion factor \$34,8931, per Consolidated Appropriations Act, 2021, see CMS special update January 7

• Source: CY 2021 PFS Final Rule Addenda (Updated 12/29/2020)



CY 2021 Medicare PFS Other Digital Health Services Billing Codes & Rates



Code	Type of Service	Medicare Short Descriptor	Facility Rate (Nat. Avg.)	Non-Facility Rate (Nat. Avg.)
98970	eVisit	Qnhp ol dig assmt&mgmt 5-10	\$11.51	\$11.86
98971	eVisit	Qnhp ol dig assmt&mgmt 11-20	\$20.59	\$20.94
98972	eVisit	Qnhp ol dig assmt&mgmt 21+	\$32.80	\$32.80
99421	eVisit	Ol dig e/m svc 5-10 min	\$12.91	\$15.00
99422	eVisit	Ol dig e/m svc 11-20 min	\$26.17	\$30.01
99423	eVisit	Ol dig e/m svc 21+ min	\$41.17	\$47.45
G2010	Virtual Check-in (S&F)	Remot image submit by pt	\$9.42	\$12.21
G2012	Virtual Check-in (Phone or Video)	Brief check in by md/qhp	\$13.26	\$14.66
G2250	Virtual Check-in (S&F)	Remot img sub by pt, non e/m	\$9.42	\$12.21
G2251	Virtual Check-in (Phone or Video)	Brief chkin, 5-10, non-e/m	\$13.26	\$14.66
G2252	Virtual Check-in (Phone or Video)	Brief chkin by md/qhp, 11-20	\$25.47	\$26.87

• New conversion factor \$34,8931, per Consolidated Appropriations Act, 2021,

see CMS special update January 7

Source: CY 2021 PFS Final Rule Addenda (Updated 12/29/2020)



# Other Policy Changes Impacting Telehealth (COVID-19)

#### Flexibilities enhance access to care during the pandemic

#### Prescribing Controlled Substances Via Telehealth

- DEA waiver to allow remote prescribing of controlled substances via telehealth without initial in-person visit (certain conditions must be met)
- Buprenorphine to new and existing patients with OUD via telephone without initial inperson visit



#### Other



- Privacy
- Licensure
- Consent
- Supervision

Note: January 14, 2021 HHS eliminates X-Waiver requirement for DEA-registered physicians



# End-of-Year Stimulus & Government Funding Package



#### **Consolidated Appropriations Act**

- Expanded payment for telebehavioral health services
  - Removed rural geographic restriction
  - Added patient's home
  - Requires in-person item or service for which payment was made
    - Within 6 months prior to initial telehealth visit
    - Exceptions SUDs/co-occurring MH disorders
- Added small rural emergency hospitals (under 50 beds) as eligible originating sites
- Delayed implementation of G2211 (E/M add on code) until CY2024
- Expanded grant funding for telehealth
- Increased payment rates for 2021



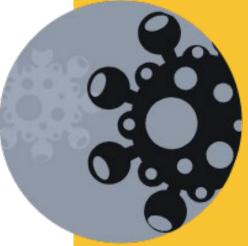
### **State-level Telehealth Policy Changes COVID-19**

### **Medicaid**

- Expanded reimbursement
- Allowed audio-only / telephonic visits
- Waived cost-sharing requirements

### **Commercial Plans**

- Expanded coverage &reimbursement
- Paying same as in-person care (parity)
- Waived cost-sharing requirements





### What's Next for Telehealth



- Making permanent payment changes will be front and center
- Support for telehealth will continue with new administration, congressional leaders
  - Promote access
  - Ensure health equity & quality care
  - Address utilization/cost issues
- PHE period possible through end of 2021 or later





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re-imagining psychiatric care

# **Thank You!**

Providing access through telepsychiatry partnerships.

Our provider team consists of:

Psychiatrists | Psychiatric Nurse Practitioners | Licensed Clinical Social Workers