

Illinois Medicaid Telehealth Services Billing & Coding Cheat Sheet

This notice informs providers of changes to telehealth policy due to the current public health emergency related to COVID-19. These changes apply to claims billed for participants covered under fee-for-service as well as a HealthChoice Illinois managed care plan.

To protect the public health in connection with the present public health emergency, the Department will reimburse medically necessary and clinically appropriate telehealth services with dates of service on or after March 9, 2020 until the public health emergency no longer exists.

To be eligible for reimbursement, the telehealth service must be delivered using:

an “interactive telecommunication system” or “telecommunication system” or; a communication system where information exchanged between the physician or other qualified health care practitioner and the patient during the course of the synchronous telehealth service is of an amount and nature that would be sufficient to meet the key components and requirements of the same service when rendered via face-to-face interaction.

The Department will also reimburse for the following services that do not meet the definition of “telehealth services” during this public health emergency, including:

Virtual Check-in – to all providers listed above including Federally Qualified Health Centers, Rural Health Clinics, and Encounter Rate Clinics. A brief communication technology-based service that uses **audio-only real-time telephone interactions or synchronous, two-way audio interactions that are enhanced with video or other kinds of data transmission**. Virtual check-ins must be rendered by a physician or advance practical nurse, or physician assistant who can report evaluation and management (E/M) services, provided to an established patient, not originating from a related E/M service provided within the previous 7 days nor leading to an E/M service or procedure within the next 24 hours or soonest available appointment. The Department will reimburse for CPT **codes 99441, 99442, and 99443** at the rate established on the Department’s to all providers listed above including Federally Qualified Health Centers, Rural Health Clinics, and Encounter Rate Clinics.

Online patient portal or “E-visit” - These services are non-face-to-face patient-initiated communications using online patient portals. These services can only be reported when the billing practice has an established relationship with the patient. For these encounters, the patient must generate the initial inquiry and communications can occur over a 7-day period. The patient must verbally consent to receive virtual check-in services. The Department will reimburse for HCPCS codes **G2061, G2062, G2063** and CPT codes **99421, 99422, 99423** at the rate established on the Department’s to all providers listed above including Federally Qualified Health Centers, Rural Health Clinics, and Encounter Rate Clinics.

Notwithstanding, the Department will reimburse for all behavioral health services detailed in (except for Mobile) Crisis Response and Crisis Stabilization, and behavioral health services contained on an applicable Department fee schedule provided using **audio-only real-time telephone interactions, or video interaction. Federally Qualified Health Centers, Rural Health Clinics, and Encounter Rate Clinics will receive their encounter rate.**

HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT (HIPAA): Effective immediately, the HHS Office for Civil Rights (OCR) will exercise enforcement discretion and waive penalties for HIPAA violations against health care providers that serve patients in good faith through everyday communications technologies, such as FaceTime or Skype, during the COVID-19 nationwide public health emergency.



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FAQ link to the federal guideline: <https://www.hhs.gov/hipaa/for-professionals/special-topics/hipaa-covid19/index.html>

Links used to provide the information for this cheat sheet can be found on the below:

<https://www.illinois.gov/hfs/MedicalProviders/notices/Pages/prn200320b.aspx>

<http://www.ilga.gov/commission/jcar/admincode/089/089001400D04030R.html>

<https://www.illinois.gov/hfs/MedicalProviders/MedicaidReimbursement/Pages/default.aspx>