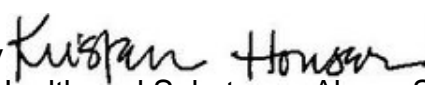


MEMORANDUM

TO: All Behavioral Health Managed Care Organizations (BH-MCOs), behavioral health providers enrolled in the Medical Assistance (MA) Program, and County Mental Health Authorities—Statewide

FROM: Kristen Houser
Deputy Secretary 
Office of Mental Health and Substance Abuse Services

RE: Telehealth Guidelines Related to COVID-19 (Updated)

DATE: May 5, 2020

PURPOSE:

The Pennsylvania Department of Human Services, Office of Mental Health and Substance Abuse Services (OMHSAS) is issuing this Memorandum to offer clarification regarding the ability of providers to use telehealth to render behavioral health services to Medical Assistance (MA) beneficiaries.

BACKGROUND:

On March 6, 2020, Governor Wolf issued an emergency [disaster declaration](#) in response to the presence of the 2019 novel coronavirus (COVID-19) in Pennsylvania. COVID-19 is a new virus that causes respiratory illness in people and can spread from person-to-person. This virus was first identified during an investigation into an outbreak in Wuhan, China. COVID-19 is a severe respiratory disease, resulting in illness or death, caused by person-to-person spread of the virus.

Commonly reported symptoms of COVID-19 infection include fever, cough, and shortness of breath. While the exact incubation period for this coronavirus has not yet been determined, it is believed that most infected people will develop symptoms 2 to 14 days after they were exposed. There is no vaccine available for COVID-19. Prevention measures center on frequent handwashing, covering coughs and sneezes, and separating people who have respiratory symptoms. Treatment for COVID-19 includes the use of over the-counter fever-relievers, drinking plenty of fluids and resting at home to help relieve symptoms. Those with more severe symptoms may be hospitalized to provide additional support.

COVERAGE OF TELEHEALTH SERVICES RELATED TO COVID-19:

Given the Centers for Disease Control and Prevention's (CDC) [recommendations](#) related to quarantine and isolation, both self-imposed and mandatory, OMHSAS is announcing a preference for use of telehealth as a delivery method for medically necessary behavioral health services as ordered, referred, or prescribed by a provider or practitioner, that can be delivered effectively when the patient is quarantined, self-quarantined, or self-isolated due to exposure or possible risk of exposure to the COVID-19 virus.

In order to ensure that individuals continue to receive necessary behavioral health services as we bolster our efforts to mitigate the spread of COVID-19, OMHSAS is temporarily suspending certain requirements that govern the provision of behavioral health services using telehealth. The guidelines for the provision of telehealth in the MA Program are delineated in the [bulletin OMHSAS-20-02](#) "Guidelines for the Use of Telehealth Technology in the Delivery of Behavioral Health Services" effective February 20, 2020. OMHSAS is adopting the following measures to fully utilize the capabilities of telehealth to manage the situation brought about by the spread of COVID-19. This expansion applies to behavioral health services delivered to MA beneficiaries via FFS or through a Behavioral Health HealthChoices Managed Care Organization.

1. During this state of emergency, telehealth will allow the use of telephonic video technology commonly available on smart phones and other electronic devices. In addition, telephone only services may be utilized in certain situations where video technology is not available.
2. Staff trained in the use of the telehealth equipment and protocols to provide operating support and staff trained to provide in-person clinical intervention will not be required to be present with the individual while they are receiving services.
3. The practitioner types that can provide services through telehealth will not be limited to psychiatrists, licensed psychologists, Certified Registered Nurse Practitioners and Physician Assistants certified in mental health; Licensed Clinical Social Workers; Licensed Professional Counselors; and Licensed Marriage and Family Therapists. Other individuals providing necessary behavioral health services will be permitted to utilize telehealth for services that are within their scope of practice.

4. The provider types that can bill for telehealth under MA FFS will not be restricted to Psychiatric Outpatient Clinics, Psychiatric Partial Hospitalization Programs, and Drug & Alcohol Outpatient Clinics. When completing the Attestation Form (Appendix B), the “Other” Field (section I.a.) is not limited to HealthChoices during this state of emergency. BH-MCOs may continue to allow billing for any provider type they determine appropriate.
5. The services (procedure codes) that can be provided through telehealth under MA FFS will not be restricted to the procedure codes identified in Attachment A of the Bulletin OMHSAS-20-02. BH-MCOs already have the flexibility to do this.
6. Provision of telehealth services in homes will not be limited to Assertive Community Treatment, Dual Diagnosis Treatment Team, or Mobile Mental Health Treatment.
7. Program requirements for the number or percentage of in-person contacts for various behavioral health services may be met with the use of telehealth.
8. Program limits on the amount of service that can be provided through telehealth are temporarily suspended.

It should be noted that these temporary measures still require adherence to other requirements that apply to the service being delivered as they would when delivered in-person.

NEXT STEPS:

Providers that are currently approved to provide services through telehealth technology may immediately begin to implement the expanded use of telehealth. Providers that are not currently approved to provide services through telehealth technology may immediately begin to implement the use of telehealth; however, new providers are still required to submit the Attestation Form as required by Bulletin OMHSAS-20-02. The Attestation Form must be submitted within 5 business days of initiating telehealth. When submitting an attestation to RA-PWTBHS@pa.gov for the COVID-19 state of emergency, please identify in the subject line “COVID-19 Emergency”.

****Newly Added (5/5/2020)****

Providers of Behavioral Health Rehabilitation Services (BHRS) and Intensive Behavioral Health Services (IBHS)

Because of the unique nature of these interventions, before providing Therapeutic Staff Support (TSS) services, Behavioral Health Technician (BHT) services, Behavioral Health Technician-Applied Behavior Analysis (BHT-ABA) services, Assistant Behavior Consultation-Applied Behavior Analysis (Assistant BC-ABA) services, IBHS group services and group services approved through the program exception process through telehealth, the provider must submit a proposal explaining how services will be delivered. Further information can be found in the bulletin OMHSAS-20-03 “Instructions and Guidelines for the Delivery of BHRS and IBHS Through Telehealth.” The proposal must be approved before the provider can begin to deliver these services.

OBSOLETE:

This Memorandum will remain in effect while a valid emergency disaster declaration authorized by the Governor related to the COVID-19 virus remains in effect. OMHSAS may re-issue this Memorandum as appropriate.

RESOURCES:

- The Pennsylvania Department of Health (DOH) has a dedicated page for COVID-19 that provides regular updates:
 - <https://www.health.pa.gov/Pages/AlertDetails.aspx>
- The Pennsylvania Department of Human Services (DHS) also has a dedicated page for COVID-19. OMHSAS will ensure updates are posted to the DHS webpage:
 - <https://www.dhs.pa.gov/providers/Providers/Pages/Coronavirus-2020.aspx>
- Federal information on the outbreak can be located on the CDC website:
 - <https://www.cdc.gov/coronavirus/2019-ncov/index.html>
- Federal information specific to Medicaid Services can be located on the Center for Medicare and Medicaid Services website:
 - <https://www.medicare.gov/state-resource-center/disaster-response-toolkit/covid19/index.html>

- Federal guidance on managing anxiety and stress related to COVID-19 for consumers, providers, emergency responders and other stakeholders is available here: included here:
 - https://www.cdc.gov/coronavirus/2019-ncov/daily-life-coping/managing-stress-anxiety.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fprepare%2Fmanaging-stress-anxiety.html