



April 14, 2020

Re: Telehealth Services and the COVID-19 Emergency Response

Dear Provider,

This notification has been developed by Kaiser Foundation Health Plan, Inc. (KFHP) to provide guidelines for the provision of telehealth services to Northern California members of KFHP during the COVID-19 public health emergency. It is the position of KFHP that the preferred delivery of services be in-person. However, due to the current health emergency, we believe telehealth is a clinically appropriate alternative to maintain access and availability of services. We anticipate there will be an end to this directive at which time providers should be prepared to return to predominantly in-person service delivery.

What services are eligible for telehealth in lieu of in-person service delivery?

Outpatient Mental Health, Applied Behavioral Analysis (ABA) Supervision and Parent Training, Speech Therapy, Occupational Therapy and Physical Therapy. For additional information, please also see "COVID-19_FAQ" which may be updated from time to time and made available on the Northern California Community Provider Portal (CPP).

What are the considerations and prerequisite actions to providing telehealth services?

Assure each member is clinically appropriate for telehealth services and such services are provided in an environment conducive to telehealth services.

No action is required to modify existing Kaiser Permanente authorizations.

Providers must document the verbal consent of each member before initiating the use of telehealth services.

Claims for telehealth services must use Place of Service (POS) code 02 and modifier 95.

Providers are encouraged to verify each member's benefits and eligibility prior to rendering telehealth services. Please visit the Northern California Community Provider Portal (CPP) for further information on means to verify members' benefits and eligibility. The CPP may be found at:

<http://providers.kaiserpermanente.org/nca/>

What are acceptable telehealth modalities?

The U.S. Department of Health and Human Services (HHS) Office for Civil Rights (OCR) has issued a Notification of Enforcement Discretion statement that it will not impose penalties for HIPAA non-compliance for using non-public facing remote communication products to provide telehealth remote communications during the COVID-19 nationwide public health emergency. The HHS information may be found at:



<https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html>

Providers are nonetheless encouraged to use appropriate HIPAA compliant telehealth platforms to communicate with individuals whenever possible. When leveraging widely available communication applications such as FaceTime or Skype, to the extent feasible, ensure the same rights to confidentiality and security as provided during face-to-face encounters. Providers must inform members of any relevant privacy considerations when using a platform that is not HIPAA compliant.

KFHP is not imposing specific requirements for technologies used to deliver services via telehealth and will allow reimbursement for covered services delivered through telehealth so long as such services are authorized, medically necessary, and clinically appropriate.

How will providers know when KFHP has discontinued the telehealth option provided for in this guidance?

Providers will be notified by letter, in the same manner as for this communication. The update will also be posted to the Northern California Community Provider Portal (CPP) at the web address noted above. Providers are encouraged to visit the CPP for ongoing updates and information about this initiative.

Thank you for your prompt attention to this matter. Please circulate this information broadly to stakeholders in your organization/practice, including contracted billing services, if applicable.

Sincerely,

A handwritten signature in cursive script that reads "Alacia Broussard".

Alacia Broussard

Administrator

Regional Medical Services Contracting