

**Provider Bulletin**  
**Delivery and Billing of Telehealth Services**  
**April 30, 2020**

### TELEHEALTH SERVICES DURING THE STATE OF EMERGENCY

Retroactive to dates of service on or after March 4, 2020, Path to Health contracted health centers may provide telehealth services to Path to Health members during the COVID-19 State of Emergency in California if all of the conditions listed below are met:

1. The service(s) would be otherwise covered by Path to Health if the services were delivered in-person by the treating health care practitioner (MD, DO, NP, or PA). Please refer to the Path to Health Provider Operations Manual and listing of Covered Procedure Codes available at <https://mypathtohealth.org/resources/>;
2. The health center's treating health care practitioner (MD, DO, NP, or PA) believes that the Path to Health covered service(s) being provided are medically necessary;
3. The treating health care practitioner (MD, DO, NP, or PA), in their professional judgment, determines it is appropriate to deliver the services via telehealth and the provider can effectively deliver the services via telehealth at the health center or from another location (e.g., the provider's home), while also maintaining the Path to Health member's privacy;
4. The telehealth service is delivered by two-way, real-time communication over the telephone (audio only) or via real-time video (audio and video); and,
5. The Path to Health member is assigned to the health center and consents to receiving the covered services via telehealth.

### TELEHEALTH CODING AND DOCUMENTATION

During the COVID-19 State of Emergency in California, when a Path to Health contracted provider (MD, DO, NP, or PA) delivers a service to a Path to Health member over the telephone or via real-time video that the provider would normally deliver in-person, the provider should document and bill the service(s) as follows:

1. Thoroughly document the visit as if the visit had occurred in person, including but not limited to:
  - a detailed patient history
  - a complete description of what Path to Health covered benefit was provided
  - an assessment/examination of the issues being raised by the patient
  - medical decision-making by the health care practitioner of low, moderate, or high complexity, as applicable, which should include items such as pertinent diagnosis(es) at the conclusion of the visit, and any recommendations for diagnostic studies, follow-up or treatments, including prescriptions
2. Use the appropriate CPT codes for the particular service(s) rendered.
3. Use the appropriate modifier **95**, **GT**, or **GQ**.
4. Health centers are **not** required to use Place of Service 02.

### SUBMITTING CORRECTED TELEHEALTH CLAIMS

If health centers have already submitted telehealth claims to Path to Health **without** using any telehealth modifiers, please resubmit corrected claims that include telehealth modifiers to AMM.

**For paper UB-04 claims**, please indicate “Corrected Claim” on the claim preferably in box 80 (remarks) and enter the value of 7 (replacement of prior claims) in the third digit of the Type of Bill [XX7] in Box 4. Add the appropriate telehealth modifier to the professional service CPT or HCPCS code (for example, 99214-95 or 99213-GQ).

**For electronic 837I submissions**, please resubmit including the appropriate telehealth modifier and indicate a “Corrected Claim” within:

Loop 2300  
NTE - Claim Note Segment  
NTE01 = "ADD"  
NTE02 = “Corrected Claim”

Loop 2300  
CLM05-3 (Claim Frequency Code) = "7" (Replacement)

### TELEHEALTH REIMBURSEMENT

During the COVID-19 State of Emergency in California, Path to Health contracted health centers will be reimbursed at their contracted rate for Path to Health covered services, whether a service is provided in-person, real-time over the telephone, or via real-time video, if the covered service is the same regardless of the modality of delivery, as determined by the provider’s description of the service on the claim. Health center claims must be complete and filed within the appropriate timeframe. Please note, there is **not** any separate reimbursement for originating site or transmission fees under Path to Health.

### PATH TO HEALTH MEMBER ENROLLMENT AND RE-ENROLLMENTS VIA TELEPHONE

Please refer to the [Path to Health COVID-19 Response Provider Bulletin](#), dated March 23, 2020, for instructions about using telephonic signatures on Path to Health member enrollment and reenrollment applications.

### Questions about Path to Health Billing or Covered Services?

Contact Advanced Medical Management (AMM), Path to Health’s third party administrator at:  
**(877) 589-6807**

### Questions about Path to Health Member Enrollment or Re-Enrollments?

Contact the Path to Health Help Desk at:  
**(800) 548-5880**