

Telehealth Policy Matrix - June 2020

The following table summarizes telehealth policy in Alaska, Colorado, Idaho, Montana, North Dakota, Oregon, South Dakota, Utah, Washington, and Wyoming, both before the Covid-19 public health emergency (PHE) and during the current crisis. Details for each topic available in the sources listed. For updates please visit: <https://www.cchpca.org/covid-19-related-state->

Alaska		
Topic	Description	More Information
Medicaid Coverage (Pre-PHE)	Video visits, store& forward, and remote monitoring all covered.	http://manuals.medicaidalaska.com/docs/dnld/Update_Policy_Clarification_Medicaid_Telemed_Coverage_20200508.pdf
		https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies/alaska-medicaid-live-video-eligible-servicespecialties
Medicaid Updates During Covid-19 Public Health Emergency	Zoom, facetime, Skype allowed for virtual visits. FQHC/RHC reimbursed at encounter rate. Expansions for telephone delivery, midwives, therapy and behavior health services. All details in link.	http://manuals.medicaidalaska.com/docs/dnld/Update_Temp_Expansion_of_Medicaid_Telemed_Coverage_Revised.pdf
Medicaid Billing	Eligible services for TM expanded - most require GT and 95 modifier and POS-02 as needed - expansion includes: telephone digital checkups, behavioral health aides, and telehealth services. See link for more details and billing requirements.	http://manuals.medicaidalaska.com/docs/dnld/Fees_Telehealth_Temp.pdf
Commercial Payor Coverage	Only for mental health. Payors that provide coverage for mental health must also provide coverage for tele mental health services.	

For all Covid-19 State policy updates please visit: <https://www.cchpca.org/covid-19-related-state-actions>

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Parity	Limited to mental health services	https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies/alaska-private-payer-laws-parity
Consent	Only required for Speech Language Pathology patients.	https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies/alaska-professional-regulationshealth-safety-consent
Prescribing	PHE: requirements relaxed (Pre-PHE Provider can prescribe prescriptions if proper documentation is sent to patient's primary care physician. Controlled substances can be prescribed if licensed care provider is present with patient to assist with examination. Cannot prescribe based solely on patient shared information over phone, fax, etc.)	https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies/alaska-professional-regulationshealth-safety-online-prescribing
Licensing (Pre-PHE)	Physicians must be licensed in State. Not part of the Medical or Nurse Licensure compacts.	
Licensing During PHE	For Out-of-state physicians and PAs- Emergency License application online, fee waived. Valid until Nov 15th. Must also be on Telemedicine Business Registry to offer telemedicine.	
Other	AK requires provider's organization be added to Telemedicine Business Registry. Business License and Emergency License fees waived. Registry application \$50. During Covid-19 response, qualified providers may deliver TM once application is received by Dept. of Commerce	https://www.commerce.alaska.gov/web/cbpl/ProfessionalLicensing/TelemedicineBusinessRegistry.aspx

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Colorado		
Topic	Description	More Information
Medicaid Coverage (Pre-PHE)	Colorado Medicaid reimburses for live video for medical and mental health services. Certain chronic conditions qualify for remote patient monitoring reimbursement (flat fee).	https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies?jurisdiction=35&category=All&topic=All
Medicaid Updates During Covid-19 Public Health Emergency	Telemedicine at FQHCs, Rural Health Centers, and Indian Health services allowed as billable encounters. Provider list expanded to include Physical Therapy, Occupational Therapy, Home Health, Hospice and Pediatric Behavioral Health Providers. Telemedicine coverage expanded: phone calls, behavioral health and dentistry. Full list of documents/actions in source.	https://www.cchpca.org/covid-19-related-state-actions
Medicaid Billing	Detailed billing guidance at source listed.	https://www.colorado.gov/hcpf/provider-telemedicine
Commercial Payor Coverage	Commercial insurers cannot deny coverage solely because service is telehealth. Consultations must be audio/visual and HIPAA compliant in order to be reimbursable.	https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies/colorado-private-payer-laws-parity

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<p style="text-align: center;">Parity</p>	<p>(Pre- PHE : Yes, insurance must reimburse for care delivered through telehealth the same as in person.)</p>	<p>https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies/colorado-private-payer-laws-parity</p>
<p style="text-align: center;">Consent</p>	<p>PHE: Verbal or Written consent accepted (Pre-PHE: Requires "appropriate consent for treatment." No further guidance. (pg. 35 of source)</p>	<p>https://www.colorado.gov/hcpf/provider-telemedicine https://www.colorado.gov/pacific/sites/default/files/Rule_18_Medical_Fee_Schedule.pdf</p>
<p style="text-align: center;">Prescribing</p>	<p>PHE: Additional refill of prescriptions allowed and all other medications except those with high likelihood of abuse. (pre-PHE: Pharmacists cannot prescribe based on online questionnaire/telehealth consult without pre-existing Patient/Practitioner relationship)</p>	<p>PHE - https://drive.google.com/file/d/1gz4G2OtzsNbA5yDbGMbFiy3HENAgnFGy/view Pre-PHE - https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies/colorado-professional-regulationhealth-safety-online-prescribing</p>
<p style="text-align: center;">Licensing (Pre-PHE)</p>	<p>Member of the following: Interstate Medical Licensure Compact, Nurse Licensing Compact, Physical Therapy Compact, and Compact of the Association of State and Provincial Psychology Boards</p>	
<p style="text-align: center;">Licensing During PHE</p>	<p>No specific relaxation found for out of state practitioners. However, relaxation of out of state licensing for psychologists, clinical social workers, professional or addiction counselors.</p>	<p>https://www.colorado.gov/pacific/sites/default/files/atoms/files/D%202020%20020%20Telehealth.pdf</p>
<p style="text-align: center;">Other</p>		

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Idaho		
Topic	Description	More Information
Medicaid Coverage (Pre-PHE)	Idaho Medicaid reimburses for live video telehealth for certain providers and for specific services. There is no reference to store-and-forward or remote patient monitoring. Facility fees not covered.	https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies?jurisdiction=41&category=All&topic=All
Medicaid Updates During Covid-19 Public Health Emergency	No changes found.	
Medicaid Billing	No changes found. See link for Pre-PHE billing guidance.	https://www.idmedicaid.com/Provider%20Guide/Provider%20Handbook.aspx
Commercial Payor Coverage	Commercial payors must cover video telemedicine services for in-network providers, providers can establish relationship with patient over video. All Covid-19 out of pocket costs for testing, diagnosis, and treatment are to be waived. (Pre-PHE no coverage requirements)	https://doi.idaho.gov/DisplayPDF?Id=775 <u>2</u>

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Parity	No parity for telemedicine (Pre-PHE)	
Consent	Required - does not specify how.	
Prescribing	<p>During PHE - Waived requirement of preexisting provider-patient relationship in order to prescribe. Does not apply to controlled substances.</p> <p>(Pre-PHE In-person patient provider relationship must be established. Cannot prescribe based on results of questionnaire.)</p>	
Licensing (Pre-PHE)	Member of the following: Interstate Medical Licensure Compact, Nurse Licensure Compact,	
Licensing During PHE	Out of state physicians licensed and in good standing in other states allowed to practice. Encouraged to alert Board. (CCHP Licensing document)	
Other	<p>Non-HIPPA compliant video platforms allowed.</p> <p>Dentists and Psychologists have board specific telehealth requirements.</p>	<p>https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies/idaho-professional-regulationhealth-safety-miscellaneous</p>

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Montana		
Topic	Description	More Information
Medicaid Coverage (Pre-PHE)	Montana Medicaid reimburses for live video under some circumstances. There is no reimbursement for store-and-forward or remote patient monitoring based on the definition for telemedicine. Does not reimburse for telemedicine if patient at home.	https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies?jurisdiction=55&category=All&topic=3
Medicaid Updates During Covid-19 Public Health Emergency	All synchronous technologies are eligible for telehealth and can be reimbursed. Provider-patient relationship can be established over the phone. Home can be originating site. Facility fee allowed.	https://www.cchpca.org/sites/default/files/2020-03/MONTANA%20-%20All%20Provider%20Memo%20-%20Telemedicine%20%203.19.20.pdf
Medicaid Billing	POS-02 and GT modifier required along with additional Montana Medicaid specific CPT codes. (See link for more details) Provider home cannot be enrolled as originating site.	https://www.cchpca.org/sites/default/files/2020-03/MONTANA%20-%20All%20Provider%20Memo%20-%20Telemedicine%20%203.19.20.pdf
Commercial Payor Coverage	Commercial Payors must cover telemedicine services for covered in-person services for eligible providers. (CCHP Covid licensing document)	

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<p style="text-align: center;">Parity</p>	<p>No statewide parity - however some insurance companies are offering reduced co-pays and deductibles for telemedicine, or waiving fees for visits with designated vendors. (Pre-PHE: No parity for telemedicine)</p>	<p>https://content.govdelivery.com/accounts/MTCSE/bulletins/2820ed0?fbclid=IwAR25_XN2Hzl0vmV31lz8ueK0oLFEbLI0K84FPwnyPwx3zxutgse0TF83S6U</p>
<p style="text-align: center;">Consent</p>	<p>PHE: Telehealth Visits must follow same consent protocol as in person. (Pre-PHE: No legal guidance.)</p>	
<p style="text-align: center;">Prescribing</p>	<p style="text-align: center;">No legal guidance.</p>	
<p style="text-align: center;">Licensing (Pre-PHE)</p>	<p>Member of the following: Interstate Medical Licensure Compact, Nurse Licensure Compact, Physical Therapy Compact.</p>	
<p style="text-align: center;">Licensing During PHE</p>	<p>Out of state physicians licensed and in good standing in other states allowed to practice and offer telemedicine. (CCHP Licensing document)</p>	
<p style="text-align: center;">Other</p>	<p>Speech-Language Pathology has board specific telehealth requirements.</p>	<p>https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies/montana-professional-regulationhealth-safety-miscellaneous</p>

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North Dakota		
Topic	Description	More Information
Medicaid Coverage (Pre-PHE)	Reimbursement for live video telemedicine with few exceptions. Store and forward not reimbursable. No mention of remote patient monitoring.	https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies?jurisdiction=63&category=All&topic=All
Medicaid Updates During Covid-19 Public Health Emergency	Equal reimbursement for all services delivered via telemedicine. Specific policy for expansion of coverage for specialties - developmental disabilities & autism. See North Dakota on site linked.	https://www.cchpca.org/covid-19-related-state-actions
Medicaid Billing	See link for specific guidance for FQHCs and billing requirements.	https://www.nd.gov/dhs/info/covid-19/docs/policy-medicare-temporary-telehealth.pdf
Commercial Payor Coverage	PHE: Expanded coverage to include range of therapies. Must ensure coverage for established patients. Audio only services covered. Insurance cannot impose specific tech requirements. (Pre-PHE: Same coverage required as care delivered in-person. Only needs to cover services deemed medically necessary.)	https://www.insurance.nd.gov/sites/www/files/documents/Bulletins/2020/Bulletin%202020-3%20Telehealth%20Guidance.pdf

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Parity	No payment parity law.	
Consent	(Pre-PHE: Written or verbal consent required for physical therapy.)	https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies?jurisdiction=63&category=All&topic=All
Prescribing	(Pre-PHE: In person medical examination needed before prescribing)	https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies/north-dakota-professional-regulationhealth-safety-online-prescribing
Licensing (Pre-PHE)	Member of the following: Interstate Medical Licensure Compact and Nurse Licensing Compact.	
Licensing During PHE	Out of state practitioners currently licensed and in good standing can see patients in state.	https://www.health.nd.gov/diseases-conditions/coronavirus/resources-health-care
Other	Pre-PHE: Originating sites facility fee cannot exceed \$20	

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Oregon		
Topic	Description	More Information
Medicaid Coverage (Pre-PHE)	Oregon Medicaid provides reimbursement for live video and audio under some circumstances. Store-and-forward and remote patient monitoring are reimbursed for dental services.	https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies?jurisdiction=66&category=All&topic=All
Medicaid Updates During Covid-19 Public Health Emergency	Telemedicine covered retroactively from 1/1/20. Payment parity for in person services. Can bill for new and existing patients. Expanded coverage of telehealth services.	https://www.oregon.gov/oha/HSD/OHP/Tools/Oregon%20Medicaid%20COVID-19%20Provider%20Guide.pdf
Medicaid Billing	Special coding requirements for audio only, consultations, check-ins and other scenarios. See page 9 Source for more details.	https://www.oregon.gov/oha/HSD/OHP/Tools/Oregon%20Medicaid%20COVID-19%20Provider%20Guide.pdf
Commercial Payor Coverage	Commercial payors must cover telemedicine services if the service would be covered in-person.	

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Parity	No specific parity law.	
Consent	(Pre-PHE: required for TeleDentistry under Medicaid, commercial payors required for physical therapy)	
Prescribing	No specific consent requirements.	
Licensing (Pre-PHE)	Not a member of the Interstate Medical Licensure Compact or the Nurse Licensure Compact.	
Licensing During PHE	Physicians and PA s with an active OR license may offer telemedicine. (CCHP Licensing document)	
Other		

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South Dakota		
Topic	Description	More Information
Medicaid Coverage (Pre-PHE)	Reimburses live video under certain circumstances. Store and forward and remote patient monitoring not reimbursed.	https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies?jurisdiction=70&category=All&topic=All
Medicaid Updates During Covid-19 Public Health Emergency	FQHC's eligible origination site. Coverage of audio only care. Expanded ABA, behavioral health, therapy, audiology. Cannot reimburse for telemedicine for patients/health care worker in the same community unless clinic is using telemedicine to reduce spread of Covid-19.	https://dss.sd.gov/docs/medicaid/providers/billingmanuals/Telemedicine.pdf
Medicaid Billing	Audio only visits should not include GT modifier. All telemedicine visits (video) need to have GT modifier. More details in site linked.	https://dss.sd.gov/docs/medicaid/providers/billingmanuals/Telemedicine.pdf
Commercial Payor Coverage	(Pre-PHE: Insurers cannot deny coverage of care solely on telemedicine.)	

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Parity	No specific parity law.	
Consent	Informed consent required - verbal or written accepted.	
Prescribing	(Pre-PHE: No specific guidance)	
Licensing (Pre-PHE)	Member of the following: Interstate Medical Licensure Compact and Nurse Licensing Compact.	
Licensing During PHE	Out of state providers licensed and in good standing may offer services for patients in state.	https://covid.sd.gov/docs/2020-07.pdf
Other		

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Utah		
Topic	Description	More Information
Medicaid Coverage (Pre-PHE)	Live video reimbursable. Store and forward and remote patient monitoring excluded from telemedicine definition and not reimbursable.	https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies?jurisdiction=73&category=All&topic=All
Medicaid Updates During Covid-19 Public Health Emergency	Any covered Medicaid State plan that does not require hands on care can be provided through telehealth. Audio only visits reimbursable.	https://medicaid.utah.gov/Documents/pdfs/covid/COVID-19_TelehealthFAQ3.20.pdf
Medicaid Billing	No specific billing guidance found.	
Commercial Payor Coverage	(Pre-PHE - coverage of telemedicine must be disclosed)	

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<p>Parity</p>	<p>No specific parity law.</p>	
<p>Consent</p>	<p>During PHE - If using non-HIPAA compliant platforms, must inform patient and give them opportunity to decline.</p>	<p>https://dopl.utah.gov/docs/Telehealth_Executive_Order.pdf</p>
<p>Prescribing</p>	<p>(Pre-PHE: provider must obtain patients relevant clinical history and current symptoms before prescribing)</p>	
<p>Licensing (Pre-PHE)</p>	<p>Any out of state physician or mental health therapist licensed in another state and in good standing can provide services to patients in state in specific circumstances. Member of the: Interstate Medical Licensure Compact, Nurse Licensure Compact, Psychology Interjurisdictional Compact, and Physical Therapy Licensure Compact</p>	<p>https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies/utah-professional-regulationhealth-safety-cross-state-licensing</p>
<p>Licensing During PHE</p>	<p>No specific expansion found.</p>	
<p>Other</p>	<p>"If a hospital participates in telemedicine, it shall develop and implement policies governing the practice of telemedicine in accordance with the scope and practice of the hospital."</p>	<p>https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies/utah-professional-regulationhealth-safety-miscellaneous</p>

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Washington		
Topic	Description	More Information
Medicaid Coverage (Pre-PHE)	Washington Medicaid (Apple Health) reimburses for live video, store-and-forward, and remote patient monitoring under some circumstances.	https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies?jurisdiction=76&category=All&topic=All
Medicaid Updates During Covid-19 Public Health Emergency	Non-HIPAA compliant platforms allowed. Audio/phone coverage.	https://www.hca.wa.gov/assets/billers-and-providers/telehealth-brief-for-COVID-03-2020.pdf
Medicaid Billing	Detailed guidance on billing in resource below: (pre-PHE: Use place of service (POS) 02 to indicate that a billed service was furnished as a telemedicine service from a distant site. Distant site practitioners billing for telemedicine services under Critical Access Hospital (CAH) optional payment method must use the GT modifier. Add modifier 95 if the distant site is designated as a non-facility.)	https://www.hca.wa.gov/information-about-novel-coronavirus-covid-19
Commercial Payor Coverage	Insurers (including employee health plans and Medicaid Managed Care) must reimburse a provider for services delivered through telemedicine or store-and-forward if The plan provides coverage when provided in-person, care is medically necessary etc.	

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Parity	PHE: Payment and coverage parity for telehealth service delivered by in-network provider. Commercial insurance prohibited from reimbursing at lower rate. (Pre-PHE: parity to go into effect Jan 1, 2021)	
Consent	PHE: Medicaid specific guidance on SAMSHA - written patient consent not required, verbal consent sufficient. Pre-PHE: All telemedicine: consent obtained before visit. Verbal consent accepted. Medicaid: written consent needed for store and forward.	
Prescribing	(pre-PHE: Held to the same standard as in-person)	
Licensing (Pre-PHE)	Member of the following: Interstate Medical Licensure Compact. Not a member of the Nurse Licensure Compact.	
Licensing During PHE		
Other		

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Wyoming		
Topic	Description	More Information
Medicaid Coverage (Pre-PHE)	Reimburses for live video in some circumstances. Remote patient monitoring and store and forward not mentioned.	https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies?jurisdiction=80&category=All&topic=All
Medicaid Updates During Covid-19 Public Health Emergency	Temporarily allowing providers to use telehealth and telephonic services at FQHC/RHCs	https://wymedicaid.portal.conduent.com/bulletins/FQHC_RHC_Tribal_Facilities_Telehealth_03.20.20.pdf
Medicaid Billing	. GT modifier required for both video and phone visits. More details in Provider manual on pages 110	https://wymedicaid.portal.conduent.com/manuals/Manual_CMS1500_01_01_20.pdf
Commercial Payor Coverage	PHE: Insurance Commissioner encouraged insurers to expand telehealth coverage - specifically for patient's current health care provider. Insurance groups cannot require services by provided by a particular provider or facility. (Pre -PHE : No requirements found)	https://www.cchpca.org/sites/default/files/2020-04/Wyoming%20COVID-19%20Bulletin.pdf

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Parity	(Pre -PHE : No requirements found)	
Consent	Written or oral consent required for physical therapy.	https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies/wyoming-professional-regulationhealth-safety-consent
Prescribing	(Pre-PHE: prescribing a controlled substance without a documented physician-patient relationship is subject to review, discipline and consequences to license.)	https://www.cchpca.org/telehealth-policy/current-state-laws-and-reimbursement-policies/wyoming-professional-regulationhealth-safety-online-prescribing
Licensing (Pre-PHE)	Member of the following: Interstate Medical Licensure Compact and Nurse Licensing Compact.	
Licensing During PHE	Out of state providers must apply to be approved by Board of Medicine.	http://wyomedboard.wyo.gov/resources/covid-19
Other		