ForwardHealth has answered questions from providers about telehealth policy changes in response to the COVID-19 outbreak. These questions and their answers are included below. The FAQs will be updated to provide helpful answers to provider questions.

**General Telehealth FAQs**

**Date:** 04/09/2020

**Question:** Are face-to-face services that are not covered by ForwardHealth allowed to be provided via telehealth?

**Answer:** No. Services that are not currently allowable by ForwardHealth in a face-to-face delivery method will remain non-allowable in any delivery method.

**Date:** 04/09/2020

**Question:** Where can I find the permanent policy changes for telehealth services?

**Answer:** The Telehealth topic (#510) of the ForwardHealth Online Handbook has been updated to include all current and permanent policies for telehealth services, including changes from the March 2020 ForwardHealth Updates 2020-09, titled “Changes to ForwardHealth Telehealth Policies for Covered Services, Originating Sites, and Federally Qualified Health Centers,” and 2020-12, titled “Temporary Changes to Telehealth Policy and Clarifications for Behavioral Health and Targeted Case Management Providers.”

Temporary policies are not included in the Online Handbook but they can be found in Updates and Alerts on the [COVID-19 Portal page](https://www.forwardhealth.wi.gov/covid-19).

**Date:** 04/09/2020

**Question:** Where can I find temporary policy changes for telehealth services?

**Answer:** Temporary policies are not included in the Online Handbook, but they can be found in Updates and Alerts on the [COVID-19 Portal page](https://www.forwardhealth.wi.gov/covid-19).
Date: 04/09/2020
Question: What are the impacts of the United States’ Department of Health and Human Services’ Notification of Enforcement Discretion for Telehealth Remote Communications during the COVID-19 Nationwide Public Health Emergency?
Answer: On March 17, 2020, the United States’ Department of Health and Human Services (HHS) announced that they will not impose penalties for noncompliance with Health Insurance Portability and Accountability Act of 1996 (HIPAA) regulatory requirements for remote communication technologies in conjunction with the good faith provision of telehealth during the national COVID-19 public health emergency.

This is a temporary change and you can find more information on HHS’ enforcement discretion webpage and their FAQs.

Date: 04/09/2020
Question: What are the requirements for informed patient consent or authorization for services provided via telehealth?
Answer: Providers must develop and implement their own methods of informed consent to confirm that a member agrees to receive services via telehealth. ForwardHealth considers verbal consent to receiving services via telehealth an acceptable method of informed consent when it is documented in the member’s medical record. For example, logging a member’s verbal consent in an Electronic Health Record.

Date: 04/09/2020
Question: What is “functional equivalency”?
Answer: At this time, ForwardHealth has not defined “functional equivalency to the face-to-face service.” However, providers are expected to perform clinically appropriate services within their scope of practice and exercise professional judgment in determining if medically necessary services can be delivered effectively via telehealth.

Telehealth may be appropriate for members who can stay near the device being used to provide telehealth services and participate in therapeutic or supportive activities with a provider who is not physically present. Telehealth may be appropriate for goals that can be accomplished through verbal and visual cueing. Telehealth is not appropriate for activities that require physical interaction or for goals that require hands-on support or physical prompting.

Covered Services
Date: 04/09/2020
Question: What are the new permanently allowable services?
Answer: Update 2020-09 announced that the following additional telehealth services are covered:
- Inpatient consultations
- Inpatient prolonged services
- E-visits
- Nursing facility service assessments
- Phone evaluation and management services
This is a **permanent** change. More information can be found in the [Telehealth](#) topic (#510).

**Date:** 04/09/2020  
**Question:** What are the services that can be temporarily provided via telehealth?  
**Answer:** ForwardHealth is allowing currently covered services to be temporarily delivered through telehealth, including audio-only (phone), if those services can be delivered with functional equivalency to the face-to-face service. This affects all service areas and enrolled professionals and paraprofessionals within current ForwardHealth coverage policy.

Services not allowable by ForwardHealth in a face-to-face delivery method will remain not allowable in any delivery method.

This is a **temporary change** that is effective from March 12, 2020, until the end of the Wisconsin public health emergency for COVID-19. More information can be found in the March 2020 Update [2020-15](#), titled “Additional Services to Be Provided Via Telehealth.”

**Date:** 04/09/2020  
**Question:** Are telehealth services covered for the Birth to 3 Program?  
**Answer:** Yes, for services that can be delivered with a functional equivalency to the face-to-face service. Telehealth services for the Birth to 3 Program are temporarily covered by ForwardHealth from March 12, 2020, until the end of Wisconsin’s public health emergency for COVID-19. More information is included in Update [2020-15](#).

**Date:** 04/09/2020  
**Question:** Are therapy (physical, occupational, and speech-language pathology) telehealth services covered?  
**Answer:** Yes, for services that can be delivered with a functional equivalency to the face-to-face service. Therapy services are temporarily covered by ForwardHealth from March 12, 2020, until the end of Wisconsin’s public health emergency for COVID-19. More information is included in Update [2020-15](#).

**Date:** 04/09/2020  
**Question:** What temporary changes affect narcotic treatment services?  
**Answer:** Beginning March 12, 2020, and until the end of the Wisconsin public health emergency for COVID-19, ForwardHealth is allowing real-time phone communication instead of face-to-face daily dosing contact by registered nurses or licensed practical nurses working in an opioid treatment program clinic.

This is a temporary change, and more details can be found in ForwardHealth [Alert 005](#), titled “Temporary Changes to Narcotic Treatment Services.”

**Date:** 04/09/2020  
**Question:** What temporary changes affect personal care services?  
**Answer:** Beginning March 12, 2020, and until the end of the Wisconsin public health emergency for COVID-19, ForwardHealth is allowing remote supervision for personal care services by registered nurses.
The nurse supervisory visit must be documented in the member’s record including, but not limited to, assessments and interventions.

During the public health emergency, ForwardHealth will allow faxed, scanned, or other copied forms of timesheets as acceptable documentation for a personal care worker’s record of care. Employees should keep all of the original versions of their timesheets.

This is a temporary change, and more details can be found in the ForwardHealth Alert 002, titled “Temporary Policy Changes for Personal Care Providers.”

**Date:** 04/09/2020  
**Question:** What temporary changes affect targeted case management services?  
**Answer:** Beginning March 12, 2020, and until the end of the Wisconsin public health emergency for COVID-19, ForwardHealth will allow remote services that use interactive, real-time technology for targeted case management services if they can be provided with functional equivalency to the face-to-face service. Interactive, real-time technology includes audio-only phone communication.

This is a temporary change, and more information can be found on pages five and six of Update 2020-12.

**Date:** 04/09/2020  
**Question:** What temporary changes affect behavioral treatment services?  
**Answer:** Beginning March 12, 2020, and until the end of the Wisconsin public health emergency for COVID-19, ForwardHealth is allowing remote services that use interactive, real-time technology for behavioral treatment services if they can be provided with functional equivalency to the face-to-face service. Interactive, real-time technology includes audio-only phone communication.

This includes only services delivered by licensed supervisors and behavioral treatment therapists, including face-to-face supervisory direction of staff.

Providers must make a good faith effort to directly oversee treatment but the minimum hours of supervision will be relaxed during Wisconsin’s public health emergency.

This is a temporary change, and more information can be found on pages four and five of Update 2020-12.

**Date:** 04/09/2020  
**Question:** What temporary changes affect Community Recovery Services?  
**Answer:** Beginning March 12, 2020, and until the end of the Wisconsin public health emergency for COVID-19, ForwardHealth is allowing remote services that use interactive, real-time technology for Community Recovery Services if they can be provided with functional equivalency to the face-to-face service. Interactive, real-time technology includes audio-only phone communication.

This is a temporary change, and more information can be found on page four of Update 2020-12.
Date: 04/09/2020  
**Question:** Can school-based services be provided via telehealth?  
**Answer:** If the service is covered by ForwardHealth, it may be provided via telehealth, including services typically provided in schools. Refer to Update [2020-15](#) for details about providers and covered services.

Date: 04/09/2020  
**Question:** Which audio-only phone-only services are covered?  
**Answer:** Effective on and after March 1, 2020, ForwardHealth added coverage for the following phone evaluation and management Current Procedural Terminology codes for allowable providers:  
- 99441  
- 99442  
- 99443

This is a **permanent** change, and more information can be found in [Telehealth](#) topic (#510). Beginning March 12, 2020, and until the end of the Wisconsin public health emergency for COVID-19, ForwardHealth will allow telehealth services provided via audio-only phone communication, for currently covered services that can be delivered with functional equivalency to the face-to-face service. For more information, refer to Update [2020-12](#).

Date: 04/09/2020  
**Question:** Are telehealth services delivered via email or text covered?  
**Answer:** No.

**Claims Submission**  
**Question:** 04/09/2020  
19. What changes were made for submitting claims for telehealth services that are temporarily allowable as outlined in Updates [2020-12](#) and [2020-15](#)?  
**Answer:** No changes were made. Providers should continue to follow all of the current claim submission procedures. Providers are encouraged to include modifier 95 to show that they are submitting claims in accordance with ForwardHealth Emergency guidance.

Date: 04/09/2020  
**Question:** Should services outlined in Update [2020-12](#) as temporarily available via telehealth use modifier 95 and the place of service code that would normally be used?  
**Answer:** Yes. Providers are encouraged to use modifier 95 as an informational code to track that they are performing telehealth outside the permanent policy listed in the [Telehealth](#) topic (#510). As a reminder, claims should be billed with the place of service (POS) code where the provider is located or, if a provider is working remotely, where they are connecting to. For example, providers working remotely from their clinic should use POS code 11 (Office).

If a service that is not listed in the [Telehealth](#) topic (#510) is performed, POS code 02 and modifier GT should not be used.
Date: 04/09/2020
Question: What modifier and POS code should be used if permanently covered telehealth services (interactive audio and visual) are delivered via phone (audio only), due to the public health emergency?
Answer: If telehealth services in the Telehealth topic (#510) are delivered via phone (audio only), because of the public health emergency, use POS code 02 and modifier GT, as normal. Providers are encouraged to add modifier 95 as an informational modifier with the normal POS code for tracking.

A flowchart is included in the Billing Clarifications for Telehealth Services Portal page.

Date: 04/09/2020
Question: Are there restrictions on originating sites (also known as the patient’s location at the time of the telehealth encounter)?
Answer: No. Effective on and after March 1, 2020, there are no restrictions on originating sites. This is a permanent change.

An originating site fee will only be allowable to specific originating sites. Refer to the Telehealth topic (#510) for a list of originating sites that may bill code Q3014.

Date: 04/09/2020
Question: Are there restrictions on distant sites (also known as provider locations)?
Answer: No. There are no restrictions on distant sites for services delivered in the United States and listed as allowable in the Telehealth topic (#510). This was clarified in Update 2020-12.

Beginning on March 12, 2020, and for the duration of the Wisconsin public health emergency for COVID-19, ForwardHealth will allow telehealth services for currently covered services that can be delivered with functional equivalency to the face-to-face service. This applies to all service areas and all enrolled professional and paraprofessional providers allowable within current ForwardHealth coverage policy. This was announced in Update 2020-15.

Date: 04/09/2020
Question: What specific billing changes affect tribal federally qualified health centers?
Answer: For dates of service on and after March 1, 2020, ForwardHealth will count distant site telehealth services provided by a tribal federally qualified health center as encounters following either the Prospective Payment System or Alternative Payment Methodology guidelines, whichever is applicable. This change was announced in Update 2020-09.

This a permanent change, and more information can be found in the Telehealth topic (#510).

Date: 04/09/2020
Question: What specific billing changes affect non-tribal federally qualified health centers?
Answer: For dates of service on or after March 1, 2020, ForwardHealth will count distant site telehealth services provided by a non-tribal federally qualified health center, also known as a Community Health
Center, as encounters following the Prospective Payment System reimbursement guidelines. This change was announced in Update 2020-09.

This a permanent change, and more information can be found in the Telehealth topic (#510).

**NEW! Date: 04/28/2020**

**Question:** What modifier and POS code should be used if we perform a telehealth visit that is a covered service according to Telehealth topic (#510) such as codes 99201–99215 (Office or other outpatient visit services) with a code that is covered under the temporary guidance such as code 96127 (Brief emotional/behavioral assessment [eg, depression inventory, attention-deficit/hyperactivity disorder (ADHD) scale], with scoring and documentation, per standardized instrument)?

**Answer:** To ensure claims are processed appropriately, when billing with the professional claim format, continue to bill at the detail level and follow the telehealth billing guidance for each procedure.

For example, bill line 001 code 99214 with POS 02 and modifier GT. Bill line 002 code 96127 with POS 11 and modifier 95.

**NEW! Date: 04/28/2020**

**Question:** How should providers submit claims for new patient telehealth visits?

**Answer:** Providers should continue to bill procedure codes 99201–99205 (New patient office or other outpatient visit services) for new patients as allowable under the Telehealth topic (#510). Providers are expected to follow correct coding guidelines and the ForwardHealth documentation billing guidelines found in the Documentation topic (#3414). Refer to the Documentation topic (#3414) for information on time-based billing.

**NEW! Date: 04/28/2020**

**Question:** How should providers bill services with in-person components?

**Answer:** Services that require an in-person component are not part of ForwardHealth permanent telehealth policy. These codes are only allowable under temporary telehealth policy when the provider feels they can reasonably obtain sufficient information for the service to be considered functionally equivalent to a face-to-face service. Under temporary telehealth policy, ForwardHealth is giving providers broad authority to determine what services are considered functionally equivalent to a face-to-face visit.

Before providing the service, the provider must determine if the service is appropriate for telehealth. Providers are expected to follow correct coding guidelines and the ForwardHealth documentation billing guidelines found in the Documentation topic (#3414).

**Changes to Requirements**

**Date: 04/09/2020**

**Question:** What paraprofessional supervision requirements have changed?

**Answer:** Beginning March 12, 2020, and until the end of the Wisconsin public health emergency for COVID-19, ForwardHealth is allowing face-to-face supervision requirements for paraprofessionals to be
met via telehealth. Face-to-face supervision requirements should be met via audio-visual technologies when possible. Providers must document supervision according to existing benefit policy. This is a temporary change.

This flexibility does not change or replace the licensure or certification of the provider’s supervising body or other regulatory authorities, per Update 2020-15.

**Date:** 04/09/2020
**Question:** What requirements have changed for mental health services?
**Answer:** Beginning March 12, 2020, and until the end of the Wisconsin public health emergency for COVID-19, ForwardHealth is allowing mental health screenings to be done via telehealth according to the remote technology guidance included in Update 2020-12.

**Date:** 04/09/2020
**Question:** What permanent changes have been made to allowable telehealth provider types?
**Answer:** Effective March 1, 2020, individual mental health and substance abuse practitioners providing services in settings other than those certified by the Division of Quality Assurance may be reimbursed for telehealth services. In addition, individual mental health and substance abuse practitioners who are not practicing in a facility certified by the Division of Quality Assurance may also be reimbursed for telehealth services.

This is a permanent change, and more information can be found in the Telehealth topic (#510).

**Date:** 04/09/2020
**Question:** What temporary changes have been made to allowable telehealth provider types?
**Answer:** Beginning on March 12, 2020, and for the duration of the Wisconsin public health emergency for COVID-19, ForwardHealth will allow telehealth services utilizing interactive synchronous (real-time) technology, including audio-only phone communication, for currently covered services that can be delivered with functional equivalency to the face-to-face service. This applies to all service areas and all enrolled professional and paraprofessional providers allowable within current ForwardHealth coverage policy. Services that are not currently covered on a face-to-face basis are not covered via telehealth.

This is a temporary change announced in Update 2020-15.

**Date:** 04/09/2020
**Question:** Have the requirements for in-person initial assessments or other face-to-face visits changed?
**Answer:** Yes, the in-person requirement has been waived if an initial assessment (or other member visits that were previously required to be in-person) can be done via telehealth with functional equivalency to the face-to-face service. This affects all service areas and enrolled professionals and paraprofessionals that are allowable within current ForwardHealth coverage policy.

Services that are not currently covered if they are face-to-face, are not covered by telehealth.
This is a temporary change that is effective from March 12, 2020, and until the end of the Wisconsin public health emergency for COVID-19. More information can be found in Update 2020-15.

Date: 04/09/2020
Question: Are providers required to be certified to provide telehealth services?
Answer: Requirements to deliver telehealth services are aligned with in-person service requirements. No additional certification is necessary.