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The Virtual RDN


Providing Nutrition Services via Telehealth



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Sponsored by the Nutrition Services Payment Committee

4/14/2022

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Disclosures

No Disclosures to report

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Learner Outcomes

At the end of this session, the participant will be able to...

1. Identify telehealth MNT billing and payment requirements and additional telehealth billing opportunities for outpatient/ambulatory care settings.
2. Describe how the changing legislative and regulatory landscape is creating opportunities for RDNs to deliver care through telehealth.
3. Identify smart business practices for RDNs providing MNT via telehealth.
4. Identify additional resources for telehealth information.



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Background

Telehealth Landscape: Pre-PHE & Current State



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What is Telehealth?

Telehealth is the use of electronic information and telecommunications technologies to support clinical health care, patient and professional health-related education, public health and health administration.

Academy of Nutrition and Dietetics Definition of Terms – October 2020

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What Telehealth is not

Telehealth is not a specific service, but a collection of means to enhance care and education delivery."¹

<https://www.cchpca.org/about/about-telehealth>

"Telehealth is the natural evolution of health care into the digital age—it is not a different type of care, but a different site of care."²

<https://www.ncaa.org/programs/data-and-information-technology/telehealth/taskforce-on-telehealth-policy/taskforce-on-telehealth-policy-tfp-findings-and-recommendations/>

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Telehealth Modalities

Remote Communication Technology (Text)

Live Video (Text)

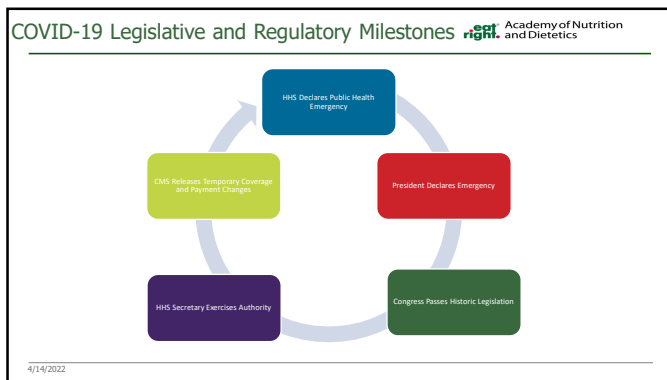
Mobile Health (Text)

Remote Patient Monitoring (Text)

Store and Forward (Text)

Center for Connected Health Policy
<https://www.cdph.ca>

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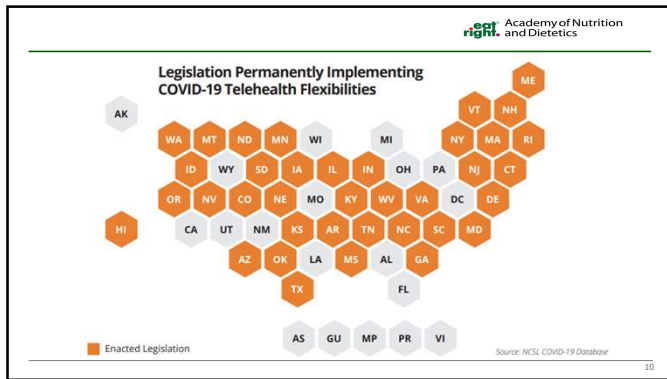
Telehealth Policies Pre/Post -COVID-19

Policies vary among the states and payers

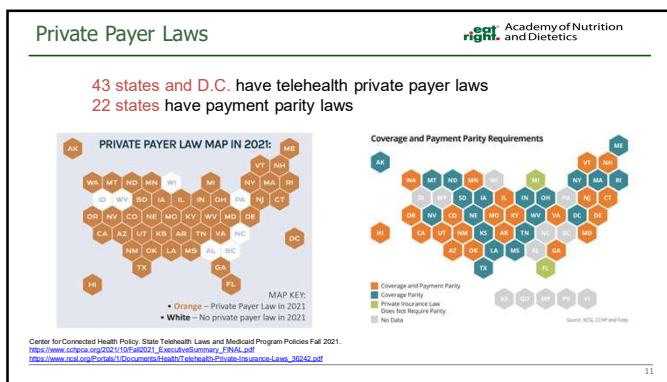
Medicare	<ul style="list-style-type: none"> Telehealth defined by Section 1834(m) of Social Security Act 2006 MNT was added to the list of telehealth eligible services
Medicaid	<ul style="list-style-type: none"> States determine respective policies
Private or Commercial Insurance	<ul style="list-style-type: none"> Policies vary by plan & state laws Telehealth "parity" laws (coverage vs payment)
Self Payment	<ul style="list-style-type: none"> Must follow state policies and rules

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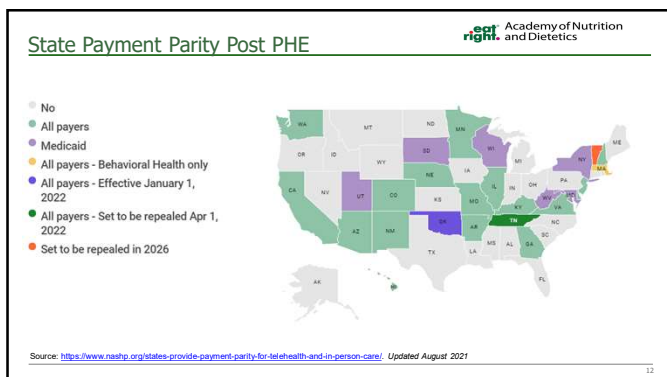
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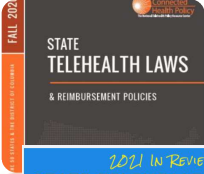



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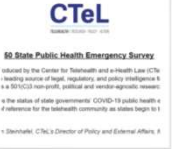
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External Resources  Academy of Nutrition and Dietetics





America Health Insurance Plans
<http://www.ahip.org/health-insurance-providers-respond-to-emergency-covid-19/>

State Action on COVID-19
 Check out NCSL's new database that brings you up-to-date, real-time information about bills related to and responding to COVID-19 that have been introduced in the 50 states and the District of Columbia.





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Current Telehealth Policies during the PHE

And how do these policies affect RDNs?



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Pre/Post-COVID: Medicare Rules for Telehealth Payment  Academy of Nutrition and Dietetics

Where: Originating site requirement

- Defined rural geographic area (Census Data and HRSA)
- Patient in authorized originating site

Who: Service delivered by authorized type of provider

- Registered Dietitian & Nutrition Professionals

What: Service within CPT/HCPCS code range

- 97802, 97803, 97804, G0270, G0108-9, G0447

How: Modality

- Two-way interactive audio-video

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PHE: Medicare Rules for Telehealth Payment

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Where:

- Originating site requirement
 - All geographic locations qualify
 - Patients home can serve as originating site
- Distant Site Providers
 - RDNs still eligible distant site providers; can furnish services from their home
 - FQHCs/RHCs can serve as distant site providers

Services:

- Service within CPT/HCPCS code range
 - 97802, 97803, 97804, G0270, G0108-9, G0447

How: Modality

- Two-way interactive audio-video, audio-only, non-public facing systems allow (OCR Exercising enforcement discretion)

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Medicare Telehealth Policies: Coding & Billing

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- 97802, 97803, 97804, G0270, G0108, G0109
- Use Usual Place of Service (POS) code with 95 modifier
- GT modifier – only CAH Optional Billing Method II
- Paid at same rate as in-person service
- UB-04: Revenue Code 780

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Medicare Telehealth Policies: Hospital Outpatient Departments

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Past: One Path


- Telehealth service

Present: Two Paths

- Telehealth service
- "Hospitals without walls"

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Medicare Telehealth Policies: FQHCs/RHCs  Academy of Nutrition and Dietetics


- RDNs can furnish MNT and DSMT via telehealth
- RDN can be at their home
- Patient can be at their home

Billing Codes for FQHC or RHC telehealth Services	
For FQHC and RHC telehealth services provided on or after July 1, 2020 through the end of the COVID-19 Public Health Emergency, use the following:	
HCPCS Code	02025
Revenue Code	052X
Reimbursement Rate	\$97.24
Modifiers	CS: required if cost-sharing is waived (e.g. COVID-19 testing related services or preventive services provided via telehealth) CG: optional (not required on or after July 1, 2020)

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Medicare Telehealth Policies  Academy of Nutrition and Dietetics




Audio-Only Delivery

- 97802-4
- G0270
- G0108-9
- G0447
- Code and bill as an in-person visit
- Support with documentation

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Medicare Policies: Remote Communications Technology Based Services  Academy of Nutrition and Dietetics

Pre-Waiver	With the Waiver
<ul style="list-style-type: none"> • Telephone assessment and management codes non-covered (98966-8) 	<ul style="list-style-type: none"> • Telephone assessment and management codes covered (98966-8)

Does not change existing coverage for MNT/nutrition services

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Is it telehealth or something else?

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Telephone only
Patient and/or family members/caregivers
Initiated by patient or family
More than 7 days after MNT/DSMT service

It's something else:
98966-8: Telephone assessment and management service provided by a qualified non-physician health care professional to an established patient, parent, or guardian



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Medicare Advantage: Telehealth Policies

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Pre-Waiver	With the Waiver
<ul style="list-style-type: none"> Must offer same coverage as Medicare FFS Flexibility to have more expansive telehealth policies (not types of providers) 	<ul style="list-style-type: none"> Allowed to provide services via telehealth in any geographic location and from a variety of places, including the patient's home CMS exercising enforcement discretion for expanded coverage of telehealth services

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Medicaid: Telehealth Policies

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Existing Telehealth Policy Pre-COVID-19

- Varies by state
- Varies by fee-for-service and managed care
- Coding varies (POS codes, modifiers)

Policy Change in Response to COVID-19

- States have broad authority to utilize telehealth
- States can use telephonic consultations when certain conditions are met
- Allowing home (30 states and DC)
- Relaxed consent requirements
- Expanded types of services eligible
- Allowed other providers such as allied health professionals
- Waived some licensing requirements


What is Covered at This Time?

- Evolving: <https://dhhs.ne.gov/Pages/Medicaid-and-Long-Term-Care.aspx>
- <https://www.cchpca.org/resources/covid-19-related-state-actions>

Does not change existing coverage for MNT/nutrition services or RD/N provider status.

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Commercial and Private Payers  Academy of Nutrition and Dietetics

Existing Telehealth Policy Pre-COVID-19

- Nearly all offered plans with some type of telehealth product
- Coverage varies by payer and specific plan
- Fee schedules vary
- Coding varies (POS codes, modifiers)

Policy Change in Response to COVID-19


- All national insurance carriers voluntarily expanded telehealth coverage on a temporary basis
- Payers typically issued blanket expansions for all covered and medically necessary services under existing coverage plan
- Many plans are offering telehealth services for free
- Some are covering limited out-of-network telehealth services
- Most reimbursing providers at the in-person rate
- Many expanded policies expired late 2020; some extend into 2021 (often tied to PHE)
- Virtual visit first for certain situations

What is Covered at This Time?

- Evolving
- Check with payer/specific plan

Does not change existing coverage for MNT/nutrition services or provider status.
Center for Connected Health Policy. An analysis of private payer telehealth coverage during the COVID-19 pandemic. Published 2021. <https://www.cchp.us/telehealth/2020Coverage%20PreandPost.pdf>
<https://www.ahrq.org/health-care/advancing-telehealth/telehealth-covid-19/>
America's Health Insurance Plans (AHIP). Telehealth: Connecting Consumers to Care Everywhere. <https://www.ahip.org/wp-content/uploads/2021/01/Telehealth-031219.pdf> Published 2019.

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New Place of Service (POS) Codes  Academy of Nutrition and Dietetics

POS 02: Telehealth Provided Other than in Patient's Home

- Patient is not located in their home when receiving health services or health related services through telecommunication technology.


POS 10: Telehealth Provided in Patient's Home

- Patient is located in their home (which is a location other than a hospital or other facility where the patient receives care in a private residence) when receiving health services or health related services through telecommunication technology.

Medicare = No

Other payers = ???

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New Audio Only Modifier  Academy of Nutrition and Dietetics

Modifier 93 – Synchronous Telemedicine Service Rendered Via Telephone or Other Real-Time Interactive Audio-Only Telecommunications System:

Synchronous telemedicine service is defined as a real-time interaction between a physician or other qualified health care professional and a patient who is located away at a distant site from the physician or other qualified health care professional. The totality of the communication of information exchanged between the physician or other qualified health care professional and the patient during the course of the synchronous telemedicine service must be of an amount and nature that is sufficient to meet the key components and/or requirements of the same service when rendered via a face-to-face interaction.

Will payers require?

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Telehealth: Future




Image source: <https://blog.planview.com/can-a-project-have-two-critical-paths-and-other-cp-questions/>

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Telehealth
Smart Business Practices

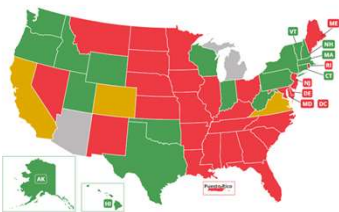


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Licensure



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Licensure Map:
<https://www.eatrightpro.org/advocacy/licensure/licensure-map>


Email licensure@eatright.org

Licensure Office Hours:
Wednesdays 1-2 p.m. (Central Time)


- Link to register [here](#)

Legend:
 No Licensure or Practice in Title
 Practice Restriction
 Licensure of Title Only or Certification of Skills
 Title Protection Without Formal State Regulation

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Documentation and Consent 

- **Documentation**
 - Appropriate, clear documentation
 - Include: date/time/length of service
 - How the service was delivered
 - Who was present
- **Consent**
- **Forms & Document Sharing**



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Scope and Standards of Practice 

www.eatrightpro.org/scope

- **Scope of Practice**
- **Standards of Practice in Nutrition Care and Standards of Professional Performance**

Practicing Telehealth

The Academy of Nutrition and Dietetics has defined Telehealth and Telenutrition in the [Definition of Terms Link](#)

Telehealth is the use of electronic information and telecommunications technologies to support long-distance clinical health care, patient and professional health-related education, public health and health administration. Telehealth will include both the use of interactive, specialized equipment, for such purposes as health promotion, disease prevention, diagnosis, consultation, therapy, and/or nutrition intervention/plan of care, and non-interactive (or passive) communications, over the Internet, video-conferencing, e-mail or fax lines, and other methods of distance communications for communication of broad-based nutrition information.

Telenutrition involves the interactive use, by a RDN, of electronic information and telecommunications technologies to implement the Nutrition Care Process (nutrition assessment, nutrition diagnosis, nutrition intervention/plan of care, and nutrition monitoring and evaluation) with patients or clients at a remote location, within the provisions of their state licensure as applicable.

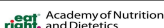
Telehealth Practice Tips and Resources

- [Practice Tips, Telehealth Challenges and Opportunities](#)
- [Case Study: RDNs Delivering Telehealth Nutrition-Related Services in Hospital Outpatient Setting](#)
- [Case Study: RDNs Delivering Telehealth Diabetes Care and Education-Related Services](#)
- [Case Study: RDNs Delivering Telehealth Nutrition-Related Services](#)
- [Video Consultations and Virtual Nutrition Care for Weight Management](#)

<https://www.eatrightpro.org/practice/practice-resources/telehealth/practicing-telehealth>


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Telehealth: Contracting/Credentialing 

- **If you are not credentialed with a payer, consider credentialing**
 - May be necessary for payment of services
 - Help with expansion of MNT coverage
 - Increased visibility within network
- **Medicare Part B**
 - Credentialing is required
- **Current Payer Agreements:**
 - Review and update with private payers to confirm:
 - Eligible services for Telehealth
 - Payment Parity

<https://www.eatrightpro.org/payment>



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Telehealth: Verifying Coverage and Benefits

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Verify coverage and benefits before services are rendered for every patient and document (date/time, reference number)

<https://www.eatrightpro.org/payment/nutrition-services/private-payers/verifying-benefits>

Verify Specific to Telehealth:

- ✓ Can nutrition counseling/MNT benefits be delivered via telehealth?
- ✓ Is a co-pay required?



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Telehealth Technology Options: Non-Public Facing

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Video Chats

- Apple Face Time
- Facebook Messenger video chat
- Google Hangouts video
- Zoom
- Microsoft Skype



Text Messaging

- Signal
- Jabber
- Facebook Messenger
- Google Hangouts
- WhatsApp
- iMessage

Penalties for HIPAA violations are temporarily waived at federal level for telehealth services.

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

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Telehealth Technology Options: HIPAA Compliant

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- Skype for Business/Microsoft Teams
- Updox
- VSee
- Zoom for Healthcare
- Doxy.me
- Google G Suite Hangouts Meet
- Cisco Webex Meetings/Webex Teams
- Amazon Chime
- GoToMeeting
- Spruce Health Care Messenger
- RDN practice management products




Disclaimer: The reference to named video- and text-based communications software for telehealth is informational and not intended as an endorsement of those services.

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Technology Options: Hospital Outpatient  Academy of Nutrition and Dietetics


Does your EMR have telehealth capabilities?
Follow guidance from your facility.



Creator: Gonsky
Credit: Getty Images/istockphoto

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Practicing Telehealth: Best Practices  Academy of Nutrition and Dietetics

- Make sure web camera is at eye level
- Test audio/visual prior to call
- Look directly at camera
- Ask patient/client if they can see and hear you
- Use a second screen to write notes/complete internet searches
- Use a private location

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Academy Resources  Academy of Nutrition and Dietetics




Telehealth Quick Guide for RDNs

Telehealth Discussion Board

Payment

Telehealth Regulations and Considerations by State

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Academy Telehealth Policy Stance

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Nutrition care services are critical to comprehensive health care delivery systems and should be covered when provided via telehealth under the same coverage and payment policies as in-person care.

Patients should have coverage for telehealth delivered via audio-only if they cannot effectively access or utilize audio-visual technologies.

In declared emergency situations when access to qualified providers is otherwise severely impacted, the modification of certain consumer protection policies such as licensure and HIPAA requirements may be appropriate.

Public funding and support for broadband internet, technology, digital literacy education and language services are necessary to address racial, economic and geographic health disparities and to address disabilities.

Publicly funded research on telehealth should be nationally representative and include a wide variety of services and providers, including nutrition care services provided by registered dietitian nutritionists and nutrition and dietetics technicians, registered.

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Academy Resources

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State licensure and statutory scope of practice: licensure@eatright.org

Coding/billing/coverage/payment: reimburse@eatright.org

Individual RDN and NDTR roles and competence: quality@eatright.org



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Telehealth: Review

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