



P.O. Box 10086
San Rafael, California 94912-9874

REMOTE TREATMENT OPTIONS DURING COVID-19 CRISIS

Dear Provider,

Due to the current public health crisis surrounding COVID-19, MHN has made some changes to increase flexibility in the use of remote methods of providing mental health services. Remote outpatient treatment sessions will ensure continuity of care and support social distancing protocols recommended by Federal and State Health Agencies.

1. Telephone Sessions:

Telephonic services are defined as therapy or medication management services delivered via telephone. Until further notice, telephone sessions **will be permitted**. Recent guidance provided by The Department of Health and Human Services allow for non-secure video chat platforms to be used during the COVID-19 pandemic. MHN will allow the use of popular applications that allow for video chats, including Apple FaceTime, Facebook Messenger video chat, Google Hangouts video, or Skype. There are existing video applications that are HIPAA compatible and free (i.e., wecounsel.com).

Public-facing applications such as Facebook Live, Twitch, TikTok, and similar video communication applications should not be used.

Services Included:

- Outpatient mental health office visits
- **Employee Assistance Program (EAP Risk)**- Any EAP provider can begin conducting telephone sessions

Billing Instructions for Telephonic Sessions:

- Please bill as usual, but use "GT" as the modifier

2. Telehealth Sessions:

Telehealth services are defined as utilizing a "HIPAA compliant" interactive *audio and video* telecommunications systems that permit real-time communication between the provider and the member, if possible. Providers should call the Provider Customer Service Center: 844-966-0298, M-F 8am- 5 pm PST, to obtain an attestation form, which affirms secure and appropriate delivery methods. After the form is submitted providers may begin seeing members via telehealth.

Office for Civil Rights (OCR) and US Department of Health and Human Services (HHS)ⁱ

The OCR and HHS have given some additional guidance, proceeding with Telehealth communications: *"The OCR will exercise its enforcement discretion and will not impose penalties for noncompliance with the regulatory requirements under the HIPAA Rules against covered health care providers in connection with the good faith provision of telehealth during the COVID-*



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19 nationwide public health emergency. This notification is effective immediately. Under this Notice, covered health care providers may use popular applications that allow for video chats, including Apple FaceTime, Facebook Messenger video chat, Google Hangouts video, or Skype, to provide telehealth without risk that OCR might seek to impose a penalty for noncompliance with the HIPAA Rules related to the good faith provision of telehealth during the COVID-19 nationwide public health emergency. Providers are encouraged to notify patients that these third-party applications potentially introduce privacy risks, and providers should enable all available encryption and privacy modes when using such applications.”

The temporary approval of telehealth is provided due to the current COVID-19 social distancing recommendations of the CDC and treatment services are expected to resume via face-to-face modality as soon as deemed appropriate by the health plan in consultation with the appropriate entities. MHN reserves the right to revise this authorization to face-to-face modality upon future notification as circumstances change.

Providers should consider carefully whether the member’s treatment plan goals and needs can be met through telehealth service delivery.

Services Included:

- Outpatient Mental Health Office Visit
- **Applied Behavioral Analysis (ABA) Services-** During the COVID-19 pandemic the decision has been made to temporarily allow all ABA services to be delivered via telehealth (subject to attestation of compliant delivery)
- **Partial Hospital Programs (PHP) and Intensive Outpatient Programs (IOP)-** MHN will temporarily approve medically necessary requests for telehealth delivery with the following conditions:
 - Hours and Days should match the service requested
 - Approval of the telehealth modality is temporary
 - Signed attestation, which affirms the use of a secure platform approved by MHN Provider Relations department.
- **Employee Assistance Program (EAP Risk-)** Any EAP provider can choose to submit an attestation for telehealth and begin providing video sessions.

Billing Instructions for Telehealth Sessions

- Please Bill as usual, but use POS “2” (Telehealth) and “95” as the modifier.

If you have further questions, please contact a Provider Relations Representative at mhn.providerservices@healthnet.com or (844) 966-0298.

Sincerely,

MHN Provider Relations



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ⁱ Sourced: OCR and HHS communications on 03/17/2020 link:

<https://www.hhs.gov/about/news/2020/03/17/ocr-announces-notification-of-enforcement-discretion-for-telehealth-remote-communications-during-the-covid-19.html>

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