Michigan Medicaid Telemedicine Policy Post Federal PHE

NOTE: Permanent telemedicine policy, as outlined in the upcoming telemedicine policy will be effective 1 day after the end of the Federal Public Health Emergency (PHE).

Policy Promulgation Timeline (usual process):

- 10-day internal MDHHS staff review (to begin within the next few weeks).
- 35-day public comment period.
- Final Policy effective date 30 days from issuance.

## Remaining:

- 1. All policy provisions within MSA 20-09 (except as noted below):
  - Definition, consent, privacy and security, contingency planning, etc.
  - Additional allowable originating sites: Home, Local Health Departments, "other established site considered appropriate by the provider"
  - Distant site flexibility
  - Clinic functionality as the distant site including payment of PPS rate
- 2. All policy provisions with MSA 21-24: Asynchronous Telemedicine Services
  - Store and Forward
  - eConsults
  - Remote Patient Monitoring
- 3. Physical Therapy, Occupational Therapy, Speech Language Services, Audiology (MSA 20-22 and MSA 20-53)
  - Simultaneous audio visual only
  - Select codes as listed on the telemedicine database
  - Not allowing initial evaluations via telemedicine, must be done in person.
- 4. Dental (MSA 20-21)
  - a. Simultaneous audio visual only
  - b. Limited oral evaluation

## Sunsetting:

- 1. Audio only (MSA 20-13)
  - a. For the codes listed on the telemedicine database, but specific audio only codes (such as 99441-99443 and 98966-98968) will continue to be covered.
  - b. Payment of the PPS rate for Audio only visits (MSA 20-34)
  - c. Audio only in School Services Program (MSA 20-15)
  - d. Audio only for Dental Services (MSA 20-21)
- 2. Non-Facility Rate Payment (MSA 20-09 Section G, ii Facility Rate and MSA 20-42)
  - a. Payment will be at parity with in person

## Reporting requirements:

No longer using GT modifier, POS 02 or POS 10

Report modifier 95 and POS that would be reported if the service were conducted in person.

Policy will also include additional information on guiding principles for telemedicine, documentation requirements and the appropriate use of telemedicine services.

## **Subject to Change**

This document serves to facilitate discussion and should not be used as policy guidance. Refer to the Medicaid Provider Manual and applicable bulletins for official MDHHS policy.

Last Updated: 06/27/2022