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FLORIDA MEDICAID

A Division of the Agency for Health Care Administration

Florida Medicaid Health Care Alert

March 18, 2020

Provider Type(s): 39

Telemedicine Guidance for Behavior Analysis Services

To assist with the response efforts to the 2019 novel coronavirus (COVID-19) state of emergency, the Agency for Health Care Administration (Agency) has prepared this alert to ensure providers are aware of our current Medicaid policy for telemedicine and temporary waivers/flexibilities we are enacting to reduce opportunities for community spread of the virus. The purpose of this document is to provide telemedicine guidance to providers on Florida Medicaid coverage of behavior analysis services using live, two-way communication.

Telemedicine Definition

Telemedicine is the practice of health care delivery by a practitioner who is in a site other than the site where a recipient is located, using interactive telecommunications equipment that minimally includes real time, two-way interactive communication between a recipient and a practitioner using audio and video equipment.

Current Coverage in the Florida Medicaid Program

In the fee-for-service delivery system, Florida Medicaid covers the use of telemedicine for the purpose of evaluating, diagnosing, and making treatment recommendations by a licensed practitioner. Florida Medicaid does not cover the use of telemedicine for behavior analysis services. The Agency's current telemedicine policy in the fee-for-service delivery system is available at: http://ahca.myflorida.com/medicaid/review/General/59G_1057_TELEMEDICINE.pdf.

Additional Telemedicine Flexibilities During the State of Emergency

It is imperative that services continue for children in need of behavior analysis services. During the state of emergency, the Agency is expanding coverage of behavior analysis services provided

through telemedicine (live, two-way communication) through the fee-for-service delivery system when:

- Services cannot be delivered because the center is closed (when services are delivered in the center) and home-based care is not an option; or
- The provider and/or the recipient meet one or more of the self-screening criteria for COVID-19 in accordance with the Department of Health [guidelines](#) and services cannot be delivered in the home.

Behavior analysis services may be provided via telemedicine for the purposes of caregiver training when services cannot be delivered in the home and the caregiver needs to be supported in the delivery of care. The provider must guide the caregiver in the implementation of certain components of the recipient's behavior plan to promote carryover of treatment gains. Services are covered, as described below:

Service	Procedure Code	Required Modifier
Behavior Analysis: Lead Analyst Caregiver Training	H2019 BA	GT
Behavior Analysis: Assistant Behavior Analyst Caregiver Training	H2012 BA	GT

Florida Medicaid reimburses for up to 2 hours per day (eight 15-minute units) of caregiver training provided through telemedicine.

Behavior Analysis Provider Telemedicine Requirements

Providers using telemedicine as a modality to deliver services must comply with the following:

- Ensure services are medically necessary and performed in accordance with the [BA coverage policy](#) and [fee schedule](#).
- Only existing recipients receiving behavior analysis may receive caregiver training through telemedicine.
- Providers utilizing telemedicine for delivering behavior analysis services must already be authorized to provide services to the recipient and must be fully enrolled in Florida Medicaid (i.e., provisional enrollment enacted for the duration of the emergency will not be accepted for telemedicine for BA).
- The recipient and caregiver must be present for the duration of the service provided using telemedicine.
- All direct observation requirements must be met.
- Telemedicine should not be used by a provider if it may result in any reduction to the quality of care or if the service delivered through this modality could adversely impact the recipient.
- Telemedicine services cannot be provided if another behavior analysis provider is in the home on the same date of service.
- Documentation regarding the use of telemedicine must be included in the progress notes for each encounter with a recipient. All other documentation requirements for the service must be met as described in the coverage policy.
- The provider must receive administrative authorization as described below.
- Providers must comply with the Health Insurance Portability and Accountability Act (HIPAA) when providing services; all equipment and means of communication transmission must be HIPAA compliant.

- Providers must assure that the recipient has compatible equipment and the necessary connectivity in order to send and receive uninterrupted video. Telephone or electronic-based contact with a Florida Medicaid recipient without a video component is not permitted.

Reimbursement

The Agency reimburses at the same rate detailed on the Behavior Analysis [fee schedule](#). The Agency does not reimburse the acquisition, installation, and maintenance of telecommunication devices or systems.

Prior Authorization Requirements

For existing Florida Medicaid recipients receiving behavior analysis, the provider will need to submit a brief telemedicine administrative authorization request to eQHealth Solutions. This will be an expedited authorization. It is required to ensure that the telemedicine modifier will be accepted for payment. eQHealth's web portal will be ready to receive these types of requests on **Monday 24, 2020**. Once the web portal is ready, providers may request authorization retroactive to March 19, 2020.

Additional Information

The Agency will continue to provide more information as it becomes available.

For more information, visit the Department's COVID-19 website: www.flhealth.gov/COVID-19.

QUESTIONS? FLMedicaidManagedCare@ahca.myflorida.com

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