



**AMERICAN PSYCHOLOGICAL ASSOCIATION**  
SERVICES, INC.



March 18, 2020

**RECIPIENT/ADDRESS**

Re: Providing Telehealth Services to Insureds during COVID-19 Public Health Emergency

Dear **NAME**:

We are contacting you on behalf of American Psychological Association Services, Inc.<sup>1</sup> and Michigan Psychological Association about the steps that can be taken to ensure minimal disruption in the provision of health care services to your insureds, particularly mental health services provided by duly credentialed psychologists (Limited Licensed Psychologists and Licensed Psychologists).

As you are aware, on March 6<sup>th</sup>, the President signed into law an \$8 billion emergency funding bill that includes \$500 million towards Medicare telehealth services, allowing the HHS Secretary to waive current Medicare telehealth restrictions (i.e., originating/geographic sites) during the COVID-19 public health emergency so that care can be provided regardless of where a patient is located, including in the home.

By extension, we ask you to commit to supporting continuity of care for your insureds by encouraging them and their providers to utilize telehealth services during the current COVID-19 public health emergency. It is critically important that psychologists are able to meet the needs of their patients, including experiences of heightened anxiety about the spread of this virus, without further increasing the risk of contagion.

Since we are one of the 37 jurisdictions that have enacted state coverage mandates for telehealth services, including tele-mental health services, we strongly urge you to alert your insureds of the availability of telehealth services as part of their coverage. It is important to notify providers immediately about their ability to provide telehealth services to patients, to detail what kinds of technology may be used, to remind providers of the need to ensure HIPAA compliance, and to provide guidance on how those services ought to be billed for reimbursement. We want to work with you to ensure that there is minimal disruption in services provided by psychologists to their patients during this stressful and challenging period.

To maximize access to available psychological resources, we encourage you to waive any applicable company policies and to allow for the following:

- Audio-only telephone services when traditional telehealth services cannot be provided. This would apply to current CPT codes for which psychologists receive reimbursement when providing face-to-face services. Companies are encouraged to mitigate the need for telephone-only services by

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<sup>1</sup> American Psychological Association Services, Inc. is the companion professional organization to the American Psychological Association (APA) serving all members and advocating for psychology. APA represents more than 121,000 members and associates engaged in the practice, research, and teaching of psychology.

investing in an online audiovisual system (e.g., the professional version of Zoom or Doxy.me) that could be made available to providers.

- Reimbursement for psychologists for specific non-face-to-face services conducted through electronic health record (EHR) portal messages or other HIPAA-compliant, secure platforms using online assessment services [CPT codes G2061 – G2063]:
  - G2061 - Qualified nonphysician healthcare professional online assessment, for an established patient, for up to seven days, cumulative time during the 7 days; 5-10 minutes.
  - G2062 - Qualified nonphysician healthcare professional online assessment service, for an established patient, for up to seven days, cumulative time during the 7 days; 11-20 minutes.
  - G2063 - Qualified nonphysician healthcare professional assessment service, for an established patient, for up to seven days, cumulative time during the 7 days; 21 or more minutes.
  
- Reimbursement for psychologists' time spent in consultation with interdisciplinary health care teams using interprofessional telephone/Internet/electronic health record assessment and management service [CPT codes 99446 – 99449]:
  - 99446 - Interprofessional telephone/Internet/electronic health record assessment and management service provided by a consultative physician, including a verbal and written report to the patient's treating/requesting physician or other qualified health care professional; 5-10 minutes of medical consultative discussion and review.
  - 99447 - Interprofessional telephone/Internet/electronic health record assessment and management service provided by a consultative physician, including a verbal and written report to the patient's treating/requesting physician or other qualified health care professional; 11-20 minutes of medical consultative discussion and review.
  - 99448 - Interprofessional telephone/Internet/electronic health record assessment and management service provided by a consultative physician, including a verbal and written report to the patient's treating/requesting physician or other qualified health care professional; 21-30 minutes of medical consultative discussion and review.
  - 99449 - Interprofessional telephone/Internet/electronic health record assessment and management service provided by a consultative physician, including a verbal and written report to the patient's treating/requesting physician or other qualified health care professional; 31 minutes or more of medical consultative discussion and review.
  
- Reimbursement for psychologists' use of telephone assessment and management services [CPT codes 98966 - – 98968]:
  - 98596 - Telephone assessment and management service provided by a qualified nonphysician health care professional to an established patient, parent, or guardian not originating from a related assessment and management service provided within the previous 7 days nor leading to an assessment and management service or procedure within the next 24 hours or soonest available appointment; 5-10 minutes of medical discussion.
  - 98967 - Telephone assessment and management service provided by a qualified nonphysician health care professional to an established patient, parent, or guardian not originating from a related assessment and management service provided within the previous 7 days nor leading to an assessment and management service or procedure within the next 24 hours or soonest available appointment; 11-20 minutes of medical discussion.
  - 98968 - Telephone assessment and management service provided by a qualified nonphysician health care professional to an established patient, parent, or guardian not

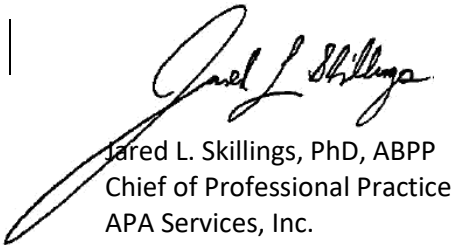
originating from a related assessment and management service provided within the previous 7 days nor leading to an assessment and management service or procedure within the next 24 hours or soonest available appointment; 21-30 minutes of medical discussion.

- Delivery of clinical services by psychologists from their home.
- Access to services via telehealth and telephone for new patients as well as existing patients.


In addition, if there are any statutory limitations on where a patient must be located to receive telehealth services, we would like to collaborate with you in petitioning the state to waive those requirements during this public health crisis. If your company has any such requirements as part of your plan coverage, we urge you to suspend those requirements until the public health emergency is lifted.

Please let us know how we can best partner with you to ensure any such communications are disseminated widely and quickly to your insureds and providers. We are happy to share information about your company's policies with our members to ensure that psychologists have the most up-to-date, accurate information about how they can continue to effectively serve their patients/your insureds during this public health emergency.


Regards,



Jared L. Skillings, PhD, ABPP  
Chief of Professional Practice  
APA Services, Inc.



Joy Wolfe Ensor, PhD  
President  
Michigan Psychological  
Association



LaVone Swanson  
Executive Director  
Michigan Psychological  
Association