



OPERATIONAL MEMO

TITLE:	BILLING GUIDANCE FOR HCBS PROVIDERS WHEN USING TELEHEALTH
SUPERSEDES NUMBER:	HCPF OM 20-077
EFFECTIVE DATE:	JULY 22, 2020
DIVISION AND OFFICE:	OFFICE OF COMMUNITY LIVING
PROGRAM AREA:	HCBS, PROVIDER BILLING, TELEHEALTH
KEY WORDS:	HOME AND COMMUNITY-BASED SERVICES, HCBS, PROVIDERS, BILLING, TELEHEALTH
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HCPF Memo Series can be accessed online: <https://www.colorado.gov/hcpf/memo-series>

Purpose and Audience:

The purpose of this Operational Memo is to provide additional clarity for Home and Community-Based Services (HCBS) waiver providers on changes in provider billing processes for HCBS that the Department previously authorized as telehealth options. This direction was originally outlined in Operational Memo 20-046: Updated Changes to Benefits and Services in Response to COVID-19.¹

Information:

In response to the COVID-19 Public Health Emergency (PHE), the Department of Health Care Policy & Financing (Department) requested additional flexibilities through an Appendix K amendment with the Centers for Medicare & Medicaid Services (CMS) to allow for the provision of HCBS through telehealth options.

¹ Find OM 20-046 and other relevant memos on the Department's Memo Series page, under "Operational Memos": <https://www.colorado.gov/hcpf/2020-memo-series-communications>.

The following are the HCBS benefits that allow the use of telehealth during COVID-19 PHE response (per OM 20-046):

- Adaptive and Therapeutic Recreational Equipment and Fees-assessment of equipment (CES)
- Adult Day Centers (BI, CMHS, EBD, SCI)
- Assistive Technology-assessment of equipment (CES, SLS)
- Behavioral Management and Education (BI)
- Behavioral Therapies – Counseling, Consultation and Assessment (SLS, DD)
- Behavioral Therapies – Line Staff (DD, SLS)
- Bereavement Counseling (CLLI)
- CHRP Wraparound – Intensive Support Services (CHRP)
- CHRP Wraparound – Transition Support Services (CHRP)
- Community Connector (CES)
- Day Treatment (BI)
- Expressive Therapy (CLLI)
- Home Modification and Adaptations-for bidding (CES, SCI, EBD, CMHS, BI, SLS)
- Independent Living Skills Training (ILST) (BI)
- Life Skills Training (LST) (SCI, EBD, CMHS, SLS)
- Mental Health Counseling (BI)
- Mentorship (SLS)
- Movement Therapy (CES, SLS)
- Palliative Supportive Care (CLLI)
- Peer Mentorship (SCI, EBD, CMHS, BI, SLS, DD)
- Pre-Vocational Services (DD, SLS)
- Specialized Habilitation (SLS, DD)
- Substance Use Counseling (BI)
- Supported Community Connections (CHRP, SLS, DD)
- Supported Employment (SLS, DD)
- Therapeutic Life Limiting Illness Support (CLLI)
- Vehicle Modifications-for bidding (CES, SLS)

The Department issued guidance to providers regarding the HCBS benefits that can be provided via telehealth (listed above). There are no changes to the service types that are eligible for telehealth options; however, the Department initially indicated no changes to billing processes. This memo notifies providers of a change to the provider billing process for telehealth for HCBS.

Effective July 22, 2020, where appropriate to the delivery mechanism, the Department instructed all HCBS providers providing HCBS via telehealth to enter "02," which represents "Telehealth," in the "Place of Service" field on

either the 1500 Claim Form or the 837P. If referencing an HCBS Billing Manual, this is field 24B. The Place of Service description for 02 is "The location where health services and health related services are provided or received, through a telecommunication system."

When offering a combination of in-person and telehealth options to the same member on the same day, HCBS providers must determine where services were provided for the longest period of time on a single Date of Service (DOS), in order to determine what Place of Service (POS) indicator to use. For example, if a day program procedure code is to be billed for the same DOS but services were provided in person as well as via Telehealth on the same day, please determine which POS occurred for longest period of time. If in person services were utilized for two hours and Telehealth utilized for three hours of service, the provider must then indicate POS as "2" for Telehealth.

Additionally, documentation must be maintained by the HCBS provider that reflects the actual services rendered (meaning must specify the time that was telehealth and the time that was in person and activities performed during each) since the claims data will not.

Providers may need to adjust how they span bill for services as the correct Place of Service must be entered at the line level of the claim. If providers have questions, they should contact the DXC Call Center at 1-844-235-2387.

If services are delivered via conventional delivery approaches, providers should continue to enter the place of service information used before the commencement of the Public Health Emergency.

For additional information about telehealth for other Medicaid services, please consult the [Telemedicine Provider page](#) on the Department's website.

Attachments:

None

Department Contact:

HCPF_HCBS_Questions@state.co.us

Department COVID-19 Webpage:

<https://www.colorado.gov/pacific/hcpf/COVID>

For specific information about COVID-19, please call the CDPHE Call Center at 303-692-2700. For general questions about COVID-19: Call CO-Help at 303-389-1687 or 1-877-462-2911 or email COHELP@RMPDC.org, for answers in English and Spanish (Español), Mandarin (普通话), and more.