



Summary of COVID-19 Changes for LCSWs – 4-8-20

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This is a list of the major changes that have occurred that impact LCSW practice, especially those of us who are private practitioners. While it is not all-inclusive, it covers the issues which have been coming up most frequently the past couple weeks. Please keep sending me your questions and I will add to the list as issues arise.

1. *Medicare Codes for Telephonic E/M check-ins*: this topic has caused much confusion. LCSWs had previously not been covered for E/M codes as they are a combination of mental health and medical evaluation. During this time of national emergency, LCSWs are one of the groups that is allowed to file claims for telephonic E/M (evaluation and management) purposes for up to 10 minutes at a time, and up to 21 minutes over a seven day period. Claims may be filed as follows:
 - G2061: Qualified non-physician healthcare professional online assessment and management, for an established patient, for up to seven days, cumulative time during the 7 days; 5–10 minutes
 - G2062: Qualified non-physician healthcare professional online assessment and management service, for an established patient, for up to seven days, cumulative time during the 7 days; 11–20 minutes
 - G2063: Qualified non-physician qualified healthcare professional assessment and management service, for an established patient, for up to seven days, cumulative time during the 7 days; 21 or more minutes.

For more information, go to <https://www.medicare.gov/coverage/e-visits>

CORRECTION: A training sponsored by CSWA on April 2, 2020, suggested that all psychotherapy provided by telephonic means only were covered by Medicare. This was incorrect. Only the new E/M codes are covered by telephonic communication.

2. *Coverage of Videoconferencing*: LCSWs can now temporarily provide psychotherapy services through videoconferencing to Medicare beneficiaries with new or established patients, whether they live in rural areas or not, and have claims covered. The coding for videoconferencing services has changed a few times over the past few weeks. Most recent Medicare guidance says that LCSWs should use “11” as the place of service and “95” as the modifier. Private insurers and Medicaid services vary by state and plan. LCSWs should contact the plan of each patient, or have the patient do so, to find out the current coverage of videoconferencing and the codes needed to submit claims.

For more information go to <https://www.cms.gov/newsroom/fact-sheets/additional-backgroundsweeping-regulatory-changes-help-us-healthcare-system-address-covid-19-patient>

3. *Temporary Coverage as Medicare Providers* : CMS has established toll-free hotlines at each of the Medicare Administrative Contractors (MACs) to allow LCSWs to initiate temporary Medicare billing privileges. LCSWs may also contact the hotline to report a change in practice location. LCSWs should only contact the hotline for the MAC that services their geographic area. To locate your designated MAC refer to <https://www.cms.gov/Medicare/Medicare-Contracting/Medicare-Administrative-Contractors/Downloads/MACs-by-State-June-2019.pdf>.

The hotlines are operational Monday – Friday and at the specified times below.

CGS Administrators, LLC (CGS)

The toll-free Hotline Telephone Number: 1-855-769-9920

Hours of Operation: 7:00 am – 4:00 pm CT

First Coast Service Options Inc. (FCSO)

The toll-free Hotline Telephone Number: 1-855-247-8428

Hours of Operation: 8:30 AM – 4:00 PM EST

National Government Services (NGS)

The toll-free Hotline Telephone Number: 1-888-802-3898

Hours of Operation: 8:00 am – 4:00 pm CT

National Supplier Clearinghouse (NSC)

The toll-free Hotline Telephone Number: 1-866-238-9652

Hours of Operation: 9:00 AM – 5:00 PM ET

Novitas Solutions, Inc.

The toll-free Hotline Telephone Number: 1-855-247-8428

Hours of Operation: 8:30 AM – 4:00 PM EST

Noridian Healthcare Solutions

The toll-free Hotline Telephone Number: 1-866-575-4067

Hours of Operation: 8:00 am – 6:00 pm CT

Palmetto GBA

The toll-free Hotline Telephone Number: 1-833-820-6138 Hours of Operation: 8:30 am – 5:00 pm ET

Wisconsin Physician Services (WPS)

The toll-free Hotline Telephone Number: 1-844-209-2567

Hours of Operation: 7:00 am – 4:00 pm CT

The MAC will attempt to screen and enroll the physician or non-physician practitioner over the phone and will notify the physician or non-physician practitioner of their approval or rejection of temporary Medicare billing privileges during the phone conversation.

The MAC will follow up with a letter via email to communicate the approval or rejection of the physician or non-physician practitioner's temporary Medicare billing privileges.

Your Medicare billing privileges are being granted on a provisional basis as a result of the public health emergency declaration and are temporary. Upon the lifting of the public health emergency declaration, you will be asked to submit a complete CMS-855 enrollment application in order to establish full Medicare billing privileges, following the MAC's review of your application. Failure to respond to the MAC's request within 30 days of the notification, will result in the deactivation of your temporary billing privileges. No payments can be received for services provided after the deactivation of your temporary billing privileges.

For more information go to <https://www.cms.gov/files/document/provider-enrollment-relief-faqs-covid-19.pdf>

4. *Eligibility of LCSWs for Small Business Loans:* As of April 10, self-employed LCSWs can submit for forgivable loans for the following reasons:

- Interest on mortgage obligations, incurred before February 15, 2020;
- Rent, under lease agreements in force before February 15, 2020; and
- Utilities, for which service began before February 15, 2020.

Loans can be for up to two months of your average monthly payroll costs from the last year plus an additional 25% of that amount.

For more information go to <https://home.treasury.gov/system/files/136/PPP--Fact-Sheet.pdf>

5. *CPT Codes for Psychotherapy Services:* CPT codes, with the exception of the newly covered E/M codes are the same as they were before, e.g., 90791, 98034, 98037, etc.
6. *Platforms for Psychotherapy Services:* HIPAA has relaxed the criteria for which platforms may be used for online services. Formerly, any platform had to be willing to sign a Business Associate Agreement. Now, any platform can be used that allows videoconferencing, e.g., Skye, Facetime, Zoom, doxy.me, VSee, etc. Zoom initially had some security problems which the company says have been resolved. However, some states have laws which still require the use of the standards that HIPAA formerly used. Check with your social work board or health department to clarify the standard in your state.

7. *Online Payment for Psychotherapy Services:* Payment for psychotherapy services has been one of the biggest changes for LCSWs. Finding an online service through which to bill patients which is confidential is challenging. Paypal/Venmo in general are not seen as secure even in privacy mode. Zelle, a bank-to-bank transfer, requires the bank of the patient use this system as well as the LCSW's bank. Ivy Pay, which is a system that is exclusively for therapists, has been the most widely used; there is a 2.75% fee. Square can also be used. A credit card may be kept on file by the LCSW and billed directly; CSWA has a template at <https://clinicalsocialwork.wildapricot.org/Credit-Card-Authorization-Form> Of course, bills may also be sent through the mail and checks or bank transfers used for payments.
8. *Informed Consent:* The changes which shifting to telemental health services have brought about should be reflected in the Informed Consent form that LCSWs ask patients to sign. Even ongoing patient should be asked to sign the new Informed Consent. CSWA has a template for telemental health Informed Consent at <https://clinicalsocialwork.wildapricot.org/Informed-Consent-for-Telemental-Health>
9. *Communications Policy:* CSWA recommends that LCSWs have a Communications Policy that reflects the shift to telemental health practice. A template for this Policy can be found at <https://clinicalsocialwork.wildapricot.org/Communication-Policy-Template>
10. *Reciprocity Across State Lines:* A few states allow LCSWs in neighboring states to practice during this emergency even if the LCSW is not licensed in the state of the patient. This varies widely. Some states also allow a waiver to treat patients who formerly came to the office of the LCSW but lived elsewhere. Check with state social work boards to address problems with continuing to treat patients who do not live in the state of your licensure.
11. *Co-Pay Relief:* Some patients seen by LCSWs are under insurance plans that offer relief from co-pays. This is an area of confusion. Check directly with the plan before waiving a patient's co-pay as to whether the plan will make up the lost income. In general, waiving the co-pay is considered insurance fraud and should be approached with caution. Some plans allow co-pay relief for in-network clinicians only.
12. *ERISA Plans:* ERISA plans are created by large companies who make their own benefits. While the MHPAEA (2014) was supposed to require mental health parity in these plans, the coverage changes to telehealth for medical/surgical services are not always reflected in the mental health/substance use services covered. Have patients request telemental health coverage for their psychotherapy services.

CSWA hopes that this information is helpful to members and welcomes any further questions.