

## CMS COVID-19 Update Call April 7, 2020

Kim Brandt – Overview of Waiver Process

Click [here](#) for the CMS slide presentation. For general questions, email: [covid-19@cms.hhs.gov](mailto:covid-19@cms.hhs.gov)

- Medicare, Medicaid and CHIP
- Applies to federal requirements only, retroactive to 3/1/20 – slide 5
- 2 types of waivers – slide 7
- Already issued waivers – slide 8
  - 66+ blanket waivers already on CMS website
- State Medicaid waivers – slide 9
- EMTALA/Stark waivers – slide 10
- Waiver authority and review process – slide 13
- How to request a waiver – slide 14
  - [1135waiver@cms.hhs.gov](mailto:1135waiver@cms.hhs.gov)

Q: Is it telehealth if hospitalist is talking with a patient in the same room?

A: No.

Q: In hospitals without walls, does existing hospital that adds beds have to modify its enrollment to account for additional beds?

A: We are allowing hospitals to expand bed capacity – contact the state, no new certification or enrollment

Q: Where can I find all waivers?

A: [www.cms.gov/emergency](http://www.cms.gov/emergency)

Q: Are waivers system wide if facilities are in different states?

A: Trying to let systems' waivers applies nationally, but it depends on what you're asking to have waived.

Q: Turnaround time?

A: ASAP

Q: How to bill for teaching facility where residents discuss the case with teaching doc, but doc isn't present due to lack of PPE?

A: Under IFR from last week, can be done through virtual technology.

Q: CPT codes for FQHC to bill for telehealth?

A: FQHCs can't report; new provisions in CARES act will allow – we're working on it; not effective yet, working as hard as we can; wouldn't give a timeframe

Q: Are old claims being expedited?

A: Trying to work with people who need additional time to file claims.

Q: Telehealth service claims

A: The 95 modifier should be used for all telehealth; because 02 was prior policy, don't expect claims filed with 02 would be delayed

Q: For SNF, do COVID patients have to be in private room?

A: Single or double rooms, cohorting. Depends on type of space facility has

Q: Swing-beds – any update as to whether the 72 hour waiver that applies to SNF, applies to swing beds also?

A: Working to get official information out.

Q: Anything on waiver on 100-day total life for SNF?

A: Still looking at it.

Q: How do we bill telehealth? Was 02, now telling us 95; can we bill as provider based

A: Report place of service as if telehealth not been use. If provider based department of hospital use that with the 95 modifier.

Q: How will hospitals get paid for testing and treatment of uninsured for COVID-19?

A: Still working on it – hope to have guidance as soon as there is resolution

Q: Re guidance on 3-day waivers for SNF?

A: Trying to get it out as quickly as possible

Q: Billing E/M – can audio only be billed?

A: Specific billing codes for when just audio is used

Q: Do we bill for telehealth where we have multiple buildings, MD in main hospital, patient in another area on campus?

A: Telehealth rules only apply when they're not in same location. Where location is two different buildings on campus, telehealth rules wouldn't apply. Would still be reimbursed, but don't have to be reported as telehealth service.