Behavioral Health Continuity
During the COVID-19 Public Health Emergency
as of April 2, 2020

Horizon Blue Cross Blue Shield of New Jersey (Horizon BCBSNJ) is committed to supporting our behavioral health network providers in assuring continuity of care for members already engaged in mental health and substance use treatment, and to assuring access for those who need mental health and substance use treatment in the face of the COVID-19 public health crisis.

As you know, the guidance surrounding COVID-19 and delivery of medical and behavioral health services is both fluid and dynamic. At Horizon BCBSNJ, we are doing our best to interpret, communicate and apply this guidance as we receive it. Updates will be posted on our dedicated websites at HorizonBlue.com/providers and HorizonNJHealth.com/providers.

To help ensure the continuity of behavioral health services during the COVID-19 public health crisis, Horizon BCBSNJ is:

• **Eliminating member cost sharing for services provided through telemedicine.**
  Horizon BCBSNJ has waived all deductibles, copays and coinsurance for in-network behavioral health services delivered through telemedicine.

• **Reimbursing for behavioral health services provided through telemedicine.**
  Consistent with the standards for telemedicine established by N.J.S.A. 45-1-61 et seq., Horizon BCBSNJ reimburses for behavioral health services delivered through telemedicine.

Horizon BCBSNJ will accept claims for telemedicine services when modifiers 95 or GT are appended to CPT® or HCPCS codes that ordinarily describe face-to-face services including but not limited to:

• Professional services related to diagnosis or treatment of COVID-19
• Routine care
• Therapy
• Mental health and substance use treatment

Horizon BCBSNJ will reimburse all behavioral health telemedicine according to our updated telemedicine reimbursement policies:

• Horizon BCBSNJ Policy
• Horizon NJ Health Policy
Using Telemedicine

Services delivered through telemedicine must meet the same service descriptions and service delivery requirements, including the length and number of clinical contact hours and documentation requirements, as those delivered in person.

Enabling Telemedicine

Horizon BCBSNJ will follow guidance issued by the Centers for Medicare & Medicaid Services (CMS), and Executive Orders issued by our federal and state governments related to relaxed standards for technology-assisted behavioral health treatment during the COVID-19 public health crisis.

President Trump recently announced that enforcement of certain components of the Health Insurance Portability and Accountability Act (HIPAA) would be waived, allowing for the use of technology that is not HIPAA-compliant (phone only, FaceTime, Skype, etc.), to meet the needs of members seeking physical and behavioral health services. CMS also provides answers to frequently asked questions.

In addition, CMS issued guidance effective March 6, 2020, related to behavioral health telemedicine service delivery. The Office for Civil Rights (OCR) at the U.S Department of Health and Human Services (HHS) also made announcements.

Reimbursing for Telemedicine

As previously announced, Horizon BCBSNJ will accept claims for telemedicine services when modifiers 95 or GT are appended to CPT® or HCPCS codes that ordinarily describe face-to-face services including but not limited to:

- Professional services related to diagnosis or treatment of COVID-19
- Routine care
- Therapy
- Mental health and substance use treatment

Regardless of the coding paradigm, Horizon BCBSNJ will pay up to the allowed amount, and in-network providers may not collect member cost share that would otherwise be collectible.

Health care professionals, facilities and ancillary providers should ensure a high-level of accuracy and compliance with the most current and appropriate coding practices, rules and guidelines.

For covered services provided by telemedicine from an out-of-network provider, cost sharing is NOT waived and members will incur out-of-pocket costs according to the specific out-of-network benefits in their plan.
Medication Management

Horizon BCBSNJ has relaxed the early refill limits for 30-day prescription maintenance medications (consistent with the member’s benefit plan) and/or encourage members to use their 90-day mail order benefit. Horizon BCBSNJ will also ensure formulary flexibility if there are shortages or access issues and not hold patients liable for additional charges stemming from obtaining a non-preferred medication resulting from shortages or access issues.

We ask that behavioral health providers carefully monitor and respond to pharmacy correspondence as we encourage members to shift to mail-order pharmacies and 90-day supplies of medications.

Applied Behavior Analysis (ABA)

As we address the behavioral health needs of our members, we are making certain that we adhere to all of the federal and state guidance provided for the use of telemedicine to support members for ABA during the COVID-19 public health crisis. ABA services delivered through telemedicine are recognized as reimbursable under Horizon BCBSNJ’s commercial and Medicaid plans through June 30, 2020. The timeline may be extended as with other accommodations recently announced by Horizon BCBSNJ depending on the duration of the COVID-19 public health emergency as declared by governmental authorities.

Effective April 1, 2020:

- ABA providers must use their clinical judgement about the appropriateness and effectiveness of using telemedicine to deliver ABA services during this period of national crisis.
- Treatment should be provided using a telemedicine platform that is synchronous in nature.
- Providers have the best knowledge of each individual member’s clinical issues and needs and should approach treatment of each member accordingly.
- Current ABA service authorizations will continue and include telemedicine delivery of services.
- This guidance applies to all ABA CPT and HCPCS codes.

If you need further information, please email the Horizon Behavioral Health team at BHNetworkRelations@HorizonBlue.com.
Business Continuity Planning

All licensed New Jersey substance use and mental health treatment programs should follow guidance from the NJ Department of Human Services related to mental health and substance use treatment during the COVID-19 public health crisis.

All programs are expected to have a continuity of operations or contingency plan in place to assure that essential services, including medication management, are continued during the crisis. Please be sure that the referrals and resources you are providing to your patients are open and accepting new patients.

Any program closure should be reported to the Horizon Behavioral Health Network Relations Team at BHNetworkRelations@HorizonBlue.com. Please include your contingency plans for managing continuity of services for Horizon BCBSNJ members active in treatment at the time of closing.

Other Resources

Horizon CareOnline (telemedicine):

Many of our commercial market members have access to Horizon CareOnline, Horizon BCBSNJ’s telemedicine platform. Eligible members can go to HorizonCareOnline.com to access urgent medical care, 24/7, and behavioral health care by appointment from 7 a.m. to 11 p.m., through video, phone or chat.

Online Support/Self-Help:
We encourage the use of moderated online support groups, self-help groups and chats to help our members.
Frequently Asked Questions (FAQs)

Q1. How can I get the latest information from Horizon BCBSNJ?
A1. Horizon BCBSNJ is receiving, processing and communicating information from various sources as quickly as possible. Things are extremely fluid and constantly changing. All updates will be posted on our websites. Providers are encouraged to visit our dedicated COVID-19 provider webpage at HorizonBlue.com/providers and HorizonNJHealth.com/providers for ongoing updates and news releases related to the COVID-19 crisis.

Q2. Do I collect copays for behavioral health telemedicine services?
A2. Horizon BCBSNJ has waived member out-of-pocket costs, including deductibles, copays and coinsurance, for all in-network telemedicine services, including behavioral health services delivered by in-network providers.

Members with out-of-network benefits may get covered services through telemedicine from their preferred health care professional, but they remain responsible for their out-of-network out-of-pocket costs according to the terms of their individual policies.

Q3. Will Horizon BCBSNJ cover telemedicine services to ensure access to care while reducing the opportunities for disease transmission?
A3. Network and non-network providers may perform services through telemedicine platforms. As such, Horizon BCBSNJ will cover the cost of office visits performed through telemedicine at the benefit level under your plans.

In addition, Horizon BCBSNJ recently announced some changes to help its members when care is received from in-network doctors.

- For all fully insured, SHBP/SEHBP, Medicaid and Medicare members Horizon BCBSNJ will relax its telemedicine rules to allow members to get covered services by phone, chat and video, including common video platforms such as FaceTime and Skype, from in-network and out-of-network health care professionals. Horizon BCBSNJ will also waive member out-of-pocket costs for covered services, including diagnosis and treatment of COVID-19, routine care, therapy or mental health care when provided by an in-network health care professional through telemedicine.

- Self-insured health plans are responsible for the specific plan designs and may not cover telephone visits.

These changes will remain in effect through June 30, 2020.

Members with out-of-network benefits may get covered services from their preferred health care professional using these platforms or phone, but they remain responsible for their out-of-network out-of-pocket costs according to the terms of their individual policies.
Q4. **What services can I provide through telemedicine?**

A4. To help you provide care to your patients, all services that can be performed through telemedicine platforms are eligible regardless of whether the service is for medical care or behavioral care. Please consult Horizon BCBSNJ’s telemedicine services guidelines:

- Horizon BCBSNJ Policy
- Horizon NJ Health Policy

Furthermore, Horizon BCBSNJ is relaxing telemedicine rules to allow phone-only visits with providers. Members will incur no out-of-pocket costs for telemedicine visits, including telephone care, when delivered by an in-network health professional. This change applies to covered services including diagnosis or treatment of COVID-19, routine care, therapy or mental health care. This is effective immediately and through **June 30, 2020**, unless extended.

Q5. **How do I bill for telemedicine?**

A5. Consistent with previous announcements, Horizon BCBSNJ will continue to accept claims for telemedicine services when modifiers 95 or GT are appended to CPT® or HCPCS codes that ordinarily describe face-to-face services including but not limited to:

- Professional services related to diagnosis or treatment of COVID-19
- Routine care
- Therapy
- Mental health and substance use treatment

Q6. **Do I need to use a certain platform or service to provide telemedicine? What do I do if I don’t have telemedicine capabilities in my practice?**

A6. The federal Health and Human Services Department has waived HIPAA enforcement regarding platforms. This allows providers to use any reasonable means of communication to work with their patients. However, we encourage the use of secure technology whenever possible.

Q7. **Have documentation requirements changed?**

A7. No. Providers must document all behavioral health services delivered through telemedicine in the same manner that they would if the patient was in-person.

Q8. **What if my patients don’t have access to the internet or phone, or really need to be monitored in person?**

A8. Behavioral health providers may still see individuals in person if medically/clinically necessary. Providers should ensure compliance with social distancing guidelines for staff and patients.
Q9. Are intensive outpatient and/or partial hospitalization programs eligible to provide services via virtual telemedicine visits?

A9. All services that can be performed through telemedicine platforms are eligible. There may be some instances where the member’s clinical needs and technological capacity suggest that the member may need to be seen in person rather than via telemedicine. Please consult Horizon BCBSNJ’s telemedicine services guidelines to determine which services may be performed through telemedicine:

- Horizon BCBSNJ Policy
- Horizon NJ Health Policy

Q10. Can ABA services be provided via virtual telemedicine visits?

A10. ABA services delivered through telemedicine are recognized as reimbursable under Horizon BCBSNJ’s commercial and Medicaid plans through June 30, 2020. The timeline may be extended as with other accommodations recently announced by Horizon BCBSNJ depending on the duration of the COVID-19 public health emergency as declared by governmental authorities.

Effective April 1, 2020:

- ABA providers must use their clinical judgement about the appropriateness and effectiveness of using telemedicine to deliver ABA services during this period of national crisis.
- Treatment should be provided using a telemedicine platform that is synchronous in nature.
- Providers have the best knowledge of each individual member’s clinical issues and needs and should approach treatment of each member accordingly.
- Current ABA service authorizations will continue and include telemedicine delivery of services.
- This guidance applies to all ABA CPT and HCPCS codes.

Q11. Can out-of-network providers be reimbursed for telemedicine services?

A11. Yes, out-of-network providers can be reimbursed for telemedicine according to the member’s plan. For covered services provided by telemedicine from an out-of-network provider, cost sharing is NOT waived and members will incur out-of-pocket costs according to the specific out-of-network benefits in their plan.