

Security Health Plan outlines telehealth documentation requirements

Telehealth became prominent during the COVID-19 pandemic. It has remained a convenient way to deliver care and continues to gain popularity. However, telehealth – by virtue of its design – comes with an increased risk for fraud, waste and abuse. The Office of Inspector General (OIG) reported numerous instances of fraud schemes involving telehealth or telemedicine services occurring in 2023.¹ Cotivity, our fraud, waste and abuse software vendor, has also tracked sharp increases in schemes involving telehealth across the United States since 2019.²

If your practice utilizes telehealth, please remember:

- Telehealth can be conducted via audio, video, telecommunication technology or a combination of these.
- If a patient's location is not their home, the location should be in a private setting where other individuals may not hear the conversation.
- The patient should be in a location where they can focus and interact during the visit without being distracted.
- When submitting claims, the claim should indicate that the services provided were via telehealth using standard coding rules.

Telehealth documentation **requirements** include:

- Method of telehealth delivery (e.g., secure two-way interactive video connection, phone call, etc.).
- Time spent in medical discussion must be explicitly documented to support the procedure code billed, including start/stop times, if required for the service (e.g., psychotherapy).
- Patient consent - Providers must document confirmation that a member agrees to receive services via telehealth. Verbal consent to receiving telehealth is an acceptable method but must be documented in the medical record (required on an annual basis for Medicaid).
- Other documentation requirements are the same as a face-to-face encounter.

Telehealth documentation **recommendations** include:

- Provider location (e.g., clinic [city/name], home, other).
- Listing all clinical participants, roles and actions (e.g., applicable when member presents at a clinic with M.D. at another location).
- Member location (e.g., clinic [city/name], home, etc.).

You can find additional information regarding telehealth or telemedicine in the Provider Manual. Click here (<https://www.securityhealth.org/providers/provider-manual/shared-content/documentation-requirements/telehealth-documentation-requirements>)

¹U.S. Department of Health and Human Services Office of Inspector General (2023). Telehealth. <https://oig.hhs.gov/reports-and-publications/featured-topics/telehealth/>

²Rutzler, E. (2023). Rising telehealth: Catching FWA in behavioral health claims. *Cotivity: White Paper*. <https://resources.cotiviti.com/fraud-waste-and-abuse/cotiviti-whitepaper-behavioralhealth#main-content>