Communication to ABA Providers Regarding Temporary Authorization to Utilize Telehealth for CPT Code 97156 During the COVID-19 National Emergency

Attention ABA providers:

TRICARE is announcing an exception to policy regarding the use of telehealth (TH) capabilities for Applied Behavior Analysis (ABA) services specifically during this COVID-19 pandemic.

During the specific time period of COVID-19 impact (effective date of March 31, 2020 through May 31, 2020), TRICARE is permitting the unlimited use of Current Procedural Terminology (CPT) code 97156 "Parent/Caregiver Guidance" via only synchronous (real-time HIPAA compliant two-way audio and video) TH services to beneficiaries with an authorization from the contractors. Should the period of emergency extend past May 31, 2020, DHA will provide additional guidance on a possible extension of this exception to policy. This exception is limited to CPT code 97156. CPT Codes 97151, 97153, and 97155 continue to be excluded from TRICARE coverage under the ACD for delivery via TH.

Should the ABA provider render CPT code 97156 via TH, the claims filed must include the GT modifier and Place of Service (POS) code 02.

CPT code 97156, in person or via TH, may be rendered by only Board Certified Behavior Analysts and assistant behavior analysts.

The contractor will remove the medically unlikely edit (MUE) on only CPT code 97156 to allow for the temporary provision of rendering unlimited CPT code 97156 via TH.

On any date of service, if the GT modifier is used for CPT code 97156, only 97151 and T1023 shall be payable. All other ABA CPT codes filed on the same date of service as CPT code 97156/GT shall be denied reimbursement.

No additional authorization is required, and no changes to the existing authorization, including expiration dates, will be required of the contractors.

The medium of TH is not appropriate for all beneficiaries diagnosed with ASD. Clinical judgement must be used when determining who is appropriate for rendering of ABA services virtually.

Every session rendered via 97156 GT will adhere to the same documentation standards set forth in TOM Chapter 18, Section 4, Paragraph 17.2. to include documenting Place of Service 02. All other ACD requirements remain in force.

All criteria defined in TPM Chapter 7, Section 22.1 "Telemedicine" apply including the use of a Health Insurance Portability and Accountability Act (HIPAA) compliant platform, and as always, providers must comply with all state/country licensing and privileging practice laws.

For authorizations that expire during this specified window, the ABA provider may submit CPT code 97151 since this code permits the use of indirect services for completing the treatment plan

update. All requirements of CPT code 97151 still apply. ABA providers should use existing data available from previously rendered protocol modification and BT session notes.

No extensions to the authorization timeline will be granted.

For authorizations expiring during this period, and subsequent authorization requests, all relevant requirements (i.e., the PDDBI) are expected to be completed on time. No retro-authorizations will be authorized. Do not let an authorization lapse. Should you intend to continue ABA services into a new authorization, the treatment plan should be developed based on the information collected over the current authorization period.

For new authorizations resulting from new referrals during this unique period, CPT code 97151 will be issued to complete an indirect assessment, review of records, and development of a treatment plan. The treatment plan should be developed with the full recommendation of all CPT codes for the 6-month authorization period. Any program modifications may be completed under in-person CPT code 97155 once the social distancing provision is lifted.

Additional FAQs are available at www.health.mil/autism.

As always, but especially during this time of national crisis, TRICARE greatly appreciates the providers who provide care to our beneficiaries Thank you! We will continue to update this policy as needed on the www.health.mil/autism website and via the TRICARE ACD provider messaging service.