MEMORANDUM (DMS-02)

To: Behavioral Health Provider
From: Division of Medical Services (DMS)
Date: March 18, 2020
Re: Telemedicine Requirements for certain Behavioral Health Providers during the COVID-19 Public Health Emergency

The Governor declared a public health emergency on March 12, 2020, due to the Coronavirus (COVID-19) outbreak in Arkansas. In response to this declaration and the need for social distancing, DMS is issuing guidance related to originating site requirements for certain behavioral health providers to provide specific counseling services. This guidance will allow licensed behavioral health professionals to continue to provide critical services to established patients while they remain in their homes. Any technology deemed appropriate may be used, including telephones, but technology must utilize direct communication that takes place in real-time.

Revised on April 15, 2020:

This guidance ends at the expiration of the public health emergency as declared by the Governor.

Patients receiving services from the following types of licensed providers enrolled with Medicaid do not have to go to an originating site (provider facility) to receive telemedicine services:

- Licensed Psychologists
- Licensed Psychological Examiner (LPE)
- Licensed Psychological Examiner - Independent (LPE-I)
- Licensed Professional Counselors (LPC)
- Licensed Associate Counselors (LAC)
- Licensed Associate Marriage and Family Therapists (LAMFT)
- Licensed Marriage and Family Therapists (LMFT)
- Licensed Clinical Social Workers (LCSW)
- Licensed Master Social Worker (LMSW)

Only the following services may be billed:

- Individual Behavioral Health Counseling
  - 90832, U4, GT
 Diagnostic services can be provided when the beneficiary is not in a separate originating provider facility.

To bill for these services, please use Place of Service “02.” The relaxed requirement for originating site will be available for dates of service March 18, 2020, and forward.

To ensure quality and consistency of care to Medicaid beneficiaries, DMS will coordinate with the Office of the Medicaid Inspector General (OMIG) to conduct retrospective reviews and audits of telemedicine services provided during the COVID-19 public health emergency. Please keep all records of services as required by Medicaid billing rules.