TRICARE Autism Care Demonstration (ACD): Regarding Temporary Authorization to Utilize Telehealth for CPT Code 97156 During the COVID-19 National Emergency

Q1: Is TRICARE allowing the delivery of applied behavior analysis (ABA) services using a telehealth (TH) platform?

A1: Yes, for parent/caregiver guidance only. TRICARE is permitting only Current Procedural Terminology (CPT) code 97156 (parent/caregiver guidance) with GT modifier and Place of Service 02 for synchronous (real-time HIPAA compliant two-way audio and video) TH delivery.

Q2: Can I bill other Adaptive Behavior Services CPT codes if I also render CPT code 97156 via TH?

A2: On any date of service, if the GT modifier is used for CPT code 97156, only 97151 and T1023 shall be payable. All other CPT codes filed on the same date of services as CPT code 97156/GT shall be denied reimbursement.

Q3: Is TRICARE allowing any ABA services by telephone?

A3: No. Service delivery via telephone is excluded in TRICARE policy. CPT Code 97156 telehealth services must be provided by live audio/video two-way communication.

Q4: Are ABA providers allowed to use the hours approved in a current authorization for CPT code 97156 via telehealth?

A4: TRICARE is temporarily lifting the Medically Unlikely Edits (MUE) for CPT code 97156 only for the period of March 31, 2020 to May 31, 2020.

Q5: How can we increase our requested hours for parent training due to this crisis and use them as telehealth visits?

A5: There is no need to request additional hours for CPT code 97156. TRICARE is temporarily lifting the daily MUE to permit increased engagement with parents/caregivers.

Q6: Is the GT modifier required for billing telehealth?

A6: Yes, bill using the GT modifier with 02 as the place of service.

Q7: Who can render CPT code 97156 via TH?

A7: Only the BCBA or assistant behavior analyst may render CPT code 97156 via TH.

Q8: Can I still render my authorized in-person services?

A8: Yes, but only in the absence of CPT code 97156 via TH. Should you render any CPT code 97156 via TH, then all other claims of CPT code 97153 and CPT code 97155 will be denied.

Q9: What should I do if a beneficiary's authorization is expiring during this period?

A9: For authorizations that expire during this specified window, please continue to complete your reassessments and treatment plan updates as you regularly would using CPT code 97151. Since CPT code 97151 allows for indirect services, there is no need for this code to be rendered via TH. You should use existing data available from the duration of the current authorization to determine new goals for the next treatment plan period. All requirements of CPT code 97151 still apply. Additionally, use of T1023 is already permitted via TH, therefore, there is no change in this service.

For new authorizations resulting from new referrals during this specific window, 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.

Please note that no extensions to the authorization timelines will be granted. Additionally, no retro-authorizations will be authorized. Do not let an authorization lapse.

Q10: Do I have to do any documentation for a parent/caregiver guidance session via TH?

A10: Yes. All documentation requirements still apply.