

Feb. 8, 2023

MB# 23-008

MEDICAID BULLETIN

TO: All Providers

SUBJECT: Clarification on Telehealth Referring Site Flexibilities Issued During the COVID-19 Public Health Emergency

On April 29, 2022, the South Carolina Department of Health and Human Services (SCDHHS) issued [Medicaid bulletin #22-005](#), which announced updates to the telehealth flexibilities issued during the current COVID-19 federal public health emergency (PHE). That bulletin grouped the telehealth flexibilities into three categories:

- Flexibilities that are being made permanent;
- Flexibilities that will be extended for further evaluation for one year after the expiration of the current federal PHE; and,
- Flexibilities that will expire at the end of the current federal PHE.

SCDHHS is issuing this bulletin to clarify the flexibilities that will be made permanent, specifically the waiving of referral site restrictions. **Referring site restrictions are permanently waived for all services that are reimbursable when performed via telehealth. This includes all telehealth services introduced through PHE flexibilities as well as those available prior to the COVID-19 PHE, which are included in the Physicians Services, Rehabilitative Behavioral Health Services, Local Education Agencies Services, Licensed Independent Practitioners Rehabilitative Services, and Community Mental Health Services provider manuals.** The telehealth flexibilities described in [Medicaid bulletins #22-005](#) and [#22-016](#) that are being extended beyond the PHE, both those that are being extended permanently and those that will be extended for one year beyond the end of the current federal PHE, will be added to their respective provider manuals prior to the end of the federal PHE.

For these services, all encounters that include both audio and visual components must include sufficient quality and/or resolution for the provider to effectively deliver the care being administered. Each encounter must also include sufficient privacy protections to comply with the Health Insurance Portability and Accountability Act of 1996 (HIPAA).

When billing for each procedure code referenced in [Medicaid bulletins #22-005](#) and [#22-016](#), **providers must continue to submit claims with a GT modifier when services are rendered via telehealth.** If

providers are required to submit any other billing modifiers when submitting claims, the GT modifier should be listed after any other modifiers.

While the exact end-date is not yet known, providers are advised that the Secretary of the U.S. Department of Health and Human Services [previously announced](#) that the federal PHE will remain in effect until at least April 11, 2023. A comprehensive list of the COVID-19-specific policy guidance SCDHHS issued during the PHE is available at www.scdhhs.gov/COVID19. Providers with questions about the policy changes announced in this bulletin should submit their questions to COVID@scdhhs.gov.

Thank you for your continued support of the South Carolina Healthy Connections Medicaid program.

/s/
Robert M. Kerr