



Provider Bulletin 20-07
March 30, 2020
(Revised May 15, 2020)



**Third-Party Liability (TPL) and Place of Service
for Services Delivered via Telehealth Platforms**

As we work together to navigate this global, unprecedented challenge, Community Behavioral Health (CBH) wants to clarify a few administrative points:

1. **When services are delivered to a CBH member via telehealth, we ask that your billing department use Place of Service (POS) code 02 instead of 99 on the claim form with any claim submitted on or after June 15, 2020 (Claim Receive Date).** This constitutes an amendment/update to the previous protocol outlined in the original Provider Bulletin 20-07, issued on March 31, 2020, which required use of the 99 POS code for all telehealth; **please continue to utilize the 99 POS code on all claims submitted prior to June 15, 2020 to denote any services performed via telehealth before transitioning to 02 POS for telehealth on that date.** We are hoping that this is a simple change, but please inform your assigned Provider Relations Representative if this presents a significant challenge. This request is to aid CBH in defining expenditures related to the lessening of regulations during the pandemic. Once we resume normal operations, it will be important to quantify expenses that were related to ensuring that our members were served during the crisis.
2. When services are delivered to a CBH member who has a primary insurer other than CBH (e.g. a person who will require coordination of benefits (COB)), we will continue to require that the provider coordinate those claims. We have **not** been informed by the Centers for Medicare and Medicaid Services (CMS) or by the Pennsylvania Office of Medical Assistance Programs (OMAP) that there is any relaxation of the Third-Party Liability (TPL) rules. However, we want to assure you that the Alternative Payment Arrangement (APA), which has been approved by OMHSAS, has the TPL/COB expenses already factored in. This means that the APA payments that have been determined will already include the monies CBH has paid through the coordination process.

We want to thank all of you for your continued partnership during this challenging time.

Should you have any questions about this Bulletin, contact Nil Gok via email at nil.gok@phila.gov.