

Illinois

Medicaid Program: Illinois Medicaid

Program Administrator: Illinois Dept. of Healthcare and Family Services

Regional Telehealth Resource Center: Upper Midwest Telehealth Resource Center www.umtrc.org

Illinois Policy At-a-Glance

MEDICAID REIMBURSEMENT			PRIVATE PAYER LAW		PROFESSIONAL REQUIREMENTS	
LIVE VIDEO	STORE-AND-FORWARD	REMOTE PATIENT MONITORING	LAW EXISTS	PAYMENT PARITY	LICENSING COMPACT	CONSENT REQUIREMENT
✓	✗	✓	✓	✗	IMLC, PSYPACT	✗

Illinois Detailed Policy

Medicaid Telehealth Reimbursement

Summary

IL Medicaid reimburses for live video telemedicine and telepsychiatry services for specific providers. A recent law change required them to expand reimbursement to other behavioral health professions beginning in Jan. 2019. Although IL definitions of telemedicine and telehealth encompass store-and-forward there is no mention of store-and-forward reimbursement. IL Medicaid will provide reimbursement for home uterine monitoring.

Definitions

“Telemedicine” is the use of a telecommunication system to provide medical services for the purpose of evaluation and treatment when the patient is at one medical provider location and the rendering provider is at another location.

Source: *IL Admin. Code, Title 89,140.403(a)(9) & IL Dept. of Healthcare and Family Svcs., Handbook for Podiatrists, F-200, p. 7 (Oct. 2016). (Accessed Feb. 2020).*

Telehealth is the use of a telecommunication system to provide medical services between places of lesser and greater medical capability and/or expertise, for the purpose of evaluation and treatment. Medical data exchanged can take the form of multiple formats: text, graphics, still images, audio and video. The information or data exchanged can occur in real time (synchronous) through interactive video or multimedia collaborative environments or in near real time (asynchronous) through “store and forward” applications.

Source: *IL Dept. of Healthcare and Family Svcs., Handbook for Practitioners. Ch. A-200 Policy and Procedures, p. 24, (Dec. 12, 2018) & Handbook for Podiatrists, F-200, p. 27 (Oct. 2016) & Handbook for Encounter Clinic Services, pg. 16-17 (Aug. 2016). (Accessed Feb. 2020).*

“Telehealth” means services provided via a telecommunication system.

Source: *IL Admin. Code, Title 89,140.403(8) (2012). (Accessed Feb. 2020).*

Telepsychiatry: Originating Site: The use of a telecommunication system to provide medical services between places of lesser and greater medical capability and/or expertise, for the purpose of evaluation and treatment. Medical data exchanged can take the form of multiple formats: text, graphics, still images, audio and video. The information or data exchanged can occur in real time (synchronous) through interactive video or multimedia collaborative environments or in near real time (asynchronous) through “store and forward” applications.

Source: *IL Dept. of Healthcare and Family Svcs., Handbook for Community-Based Behavioral Services Providers, pg. 42 (Sept. 19, 2018). (Accessed Feb. 2020).*



The Department of Healthcare and Family Services shall reimburse psychiatrists, federally qualified health centers as defined in Section 1905(l)(2)(B) of the federal Social Security Act, clinical psychologists, clinical social workers, advanced practice registered nurses certified in psychiatric and mental health nursing, and mental health professionals and clinicians authorized by Illinois law to provide behavioral health services to recipients via telehealth. The Department, by rule, shall establish: (i) criteria for such services to be reimbursed, including appropriate facilities and equipment to be used at both sites and requirements for a physician or other licensed health care professional to be present at the site where the patient is located; however, the Department shall not require that a physician or other licensed health care professional be physically present in the same room as the patient for the entire time during which the patient is receiving telehealth services; and (ii) a method to reimburse providers for mental health services provided by telehealth.

Source: 305 ILCS 5/5-5.25. (Accessed Feb. 2020).

An accident or health insurance policy providing telehealth services may not require that in-person contact occur between a health care provider and a patient, require the health care provider to document a barrier to an in-person consultation for coverage of services to be provided through telehealth, require the use of telehealth when the health care provider has determined that it is not appropriate, or require the use of telehealth when a patient chooses an in-person consultation.

Coverage must be provided for licensed dietitian nutritionists and certified diabetes educators who counsel senior diabetes patients in the senior diabetes patients' homes to remove the hurdle of transportation for senior diabetes patients to receive treatment.

Source: 215 ILCS 5/356z.22 (Accessed Feb. 2020).

Illinois Medicaid will reimburse for live video under the following conditions:

- A physician or other licensed health care professional [or other licensed clinician, mental health professional or qualified mental health professional, for telepsychiatry] must be present with the patient at all times with the patient at the originating site;
- The distant site provider must be a physician, physician assistant, podiatrist or advanced practice nurse who is licensed by Illinois or the state where the patient is located. For telepsychiatry, it must be a physician who has completed an accredited general psychiatry residency program or an accredited child and adolescent psychiatry residency program;
- The originating and distant site provider must not be terminated, suspended or barred from the Department's medical programs;
- Telepsychiatry: The distant site provider must personally render the telepsychiatry service;
- Medical data may be exchanged through a telecommunication system. For telepsychiatry it must be an interactive telecommunication system;
- The interactive telecommunication system must, at a minimum, have the capability of allowing the consulting distant site provider to examine the patient sufficiently to allow proper diagnosis of the involved body system. The system must also be capable of transmitting clearly audible heart tones and lung sounds, as well as clear video images of the patient and any diagnostic tools, such as radiographs;
- Telepsychiatry: Group psychotherapy is not a covered telepsychiatry service.

Source: IL Admin. Code Title 89, 140.403(b). (Accessed Feb. 2020).

For telemedicine services, a physician or other licensed health care professional must be present at all times with the patient at the originating site.

For telepsychiatry services, a staff member meeting the minimum qualifications of a mental health professional (MHP) must be present at all times with the patient at the originating site.

Source: IL Dept. of Healthcare and Family Svcs., *Handbook for Practitioners. Ch. A-200 Policy and Procedures*, p. 25, (Dec. 12, 2018). (Accessed Feb. 2020).



Appropriate CPT codes must be billed with the GT modifier for telemedicine and telepsychiatry services and the appropriate Place of Service code, 02, telehealth.

Source: *IL Dept. of Healthcare and Family Svcs., Handbook for Practitioners. Ch. A-200 Policy and Procedures, p. 25, (Dec. 12, 2018). (Accessed Feb. 2020).*

There is no reimbursement for group psychotherapy as a telepsychiatry service.

Source: *IL Admin. Code Title 89, 140.403. (Accessed Feb. 2020).*

Home Health Services

A face-to-face encounter may occur through telehealth

Source: *IL Dept. of Healthcare and Family Svcs., Handbook for Home Health Services. Ch. R-200 Policy and Procedures, p. 19, (May 2016). (Accessed Feb. 2020).*

The Department of Healthcare and Family Services required to reimburse psychiatrists, federally qualified health centers, clinical psychologists, clinical social workers, advanced practice registered nurses certified in psychiatric and mental health nursing and mental health professionals and clinicians authorized by Illinois law to provide behavioral health services via telehealth.

Source: *ILCS 5/5.25, (Accessed Feb. 2020).*

For telemedicine services, the distant site provider must be a physician, physician assistant, podiatrist, or advanced practice nurse who is licensed by the State of Illinois or by the state where the patient is located.

- Practitioner Handbook: When medically appropriate, more than one Distant Site provider may bill for services rendered during the telehealth visit. Podiatry Handbook: Services rendered by an APN can be billed under the collaborating physician’s NPI, or if the APN is enrolled, under the APN’s NPI. When medically appropriate, more than one Distant Site provider may bill for services rendered during the telehealth visit.

For telepsychiatry, the distant site provider must be a physician who is licensed by the State of Illinois or by the state where the patient is located who has completed an accredited general psychiatry residency program or an accredited child and adolescent psychiatry residency program.

- Practitioner Handbook: To be eligible for reimbursement for telepsychiatry services, physicians must enroll in the correct specialty/sub-specialty in IMPACT.
- Encounter Clinic Handbook: Telepsychiatry is not a covered service when rendered by an APN or PA. Group psychotherapy is not a covered telepsychiatry service.

Source: *IL Admin. Code Title 89, 140.403(b); IL Dept. of Healthcare and Family Svcs., Handbook for Podiatrists (physician services only), F-200, p. 28 (Oct. 2016); & Handbook for Practitioner Services. Ch. 200, p. 26 (Dec. 2018) Handbook for Encounter Clinic Services. Ch. 200, pg. 17. Aug. 2016. (Accessed Feb. 2020). (Accessed Feb. 2020).*

An encounter clinic serving as the distant site shall be reimbursed as follows:

1. If the originating site is another encounter clinic, the distant site encounter clinic shall receive no reimbursement from the Department. The originating site encounter clinic is responsible for reimbursement to the distant site encounter clinic; and
2. If the originating site is not an encounter clinic, the distant site encounter clinic shall be reimbursed for its medical encounter. The originating site provider will receive a facility fee.

Source: *IL Admin. Code Title 89, 140.403; IL Dept. of Healthcare and Family Svcs., Expansion of Telehealth Services, Informational Notice, Jan. 1, 2010; Handbook for Encounter Clinic Services. Ch. 200, pg. 17. Aug. 2016. (Accessed Feb. 2020).*

Encounter Rate Clinics, Federally Qualified Health Centers (FQHC), and Rural Health Clinics, are allowed to render telemedicine services.

Source: *Expansion of Telehealth Services, Informational Notice, Jan. 1, 2010 (Accessed Feb. 2020).*



The Department shall reimburse any Medicaid certified eligible facility or provider organization that acts as the location of the patient at the time a telehealth service is rendered, including substance abuse centers licensed by the Department of Human Services' Division of Alcoholism and Substance Abuse.

Source: ILCS 5/5.25, (Accessed Feb. 2020).

For telemedicine services, a physician or other licensed health care professional must be present at all times with the patient at the originating site.

For telepsychiatry services, a physician, licensed health care professional or other licensed clinician, mental health professional (MHP), or qualified mental health professional (QMHP), must be present at all times with the patient at the originating site.

Source: IL Admin. Code Title 89, 140.403(b). (Accessed Feb. 2020).

For telemedicine services, a physician or other licensed health care professional must be present at all times with the patient at the originating site.

For telepsychiatry services, a staff member meeting the minimum qualifications of a mental health professional (MHP) must be present at all times with the patient at the originating site.

Source: IL Dept. of Healthcare and Family Svcs., Handbook for Practitioners. Ch. A-200 Policy and Procedures, p. 25, (Dec. 12, 2018). (Accessed Feb. 2020).

Eligible originating sites for the facility fee include:

- Physician's office
- Podiatrist's office
- Local health departments;
- Community mental health centers;
- Outpatient hospitals.

An encounter clinic is eligible as an originating site and is responsible for ensuring and documenting that the distant site provider meets the department's requirements for telehealth and telepsychiatry services, since the clinic is responsible for reimbursement to the distant site provider.

Enrolled distant site providers may not seek reimbursement from the Department for their services when the originating site is an encounter clinic. The originating site encounter clinic is responsible for reimbursement to the distant site provider.

Source: IL Dept. of Healthcare and Family Svcs., Expansion of Telehealth Services, Informational Notice, Jan. 1, 2010; IL Dept. of Healthcare and Family Svcs., Handbook for Practitioners. Ch. 200, p. 25; Handbook for Podiatrists, F-200, p. 27 (Oct. 2016); & Handbook for Encounter Clinic Services. Ch. D-200, pg. 17. Aug. 2016. (Accessed Feb. 2020).

Local education agencies may submit telehealth services as a certified expenditure.

Source: IL Admin. Code Title 89, 140.403(c)(1)(B). (Accessed Feb. 2020).

Non-enrolled providers rendering services as a Distant Site provider shall not be eligible for reimbursement from the department, but may be reimbursed by the Originating Site provider from their facility fee payment.

Source: IL Dept. of Healthcare and Family Svcs. Handbook for Practitioners. Ch. 200, p. 25, Handbook for Podiatrists, F-200, p. 28 (Oct. 2016) (Accessed Feb. 2020).

No reference found.

Medicaid Telehealth Reimbursement

Live Video	Facility/Transmission Fee	<p>There is reimbursement for originating site facility fees.</p> <p>Eligible facilities include:</p> <ul style="list-style-type: none"> • Physician’s office; • Podiatrist’s office • Local health departments • Community mental health centers • Outpatient hospitals <p>Source: <i>IL Handbook for Practitioners Rendering Medical Services, Ch. 200, p. 25 (Dec. 2018) & Handbook for Podiatrists, F-200, p. 27 (Oct. 2016).</i> (Accessed Feb. 2020).</p>
Store-and-Forward	Policy	<p>Although store-and-forward is included within the definitions of telehealth in IL Medicaid manuals and administrative code (see descriptions below), there are no details provided on store-and-forward reimbursement and other areas of policy indicate that the GT (live video) modifier is required for telehealth services.</p> <p>Source: <i>Provider Notice Changes to Professional Claims for Telehealth Services. Jan. 10, 2018.</i> (Accessed Feb. 2020).</p> <p>The Illinois Medicaid definition encompasses store-and-forward. “The information or data exchanged can occur in real time (synchronous) through interactive video or multimedia collaborative environments or in near real time (asynchronous) through ‘store-and-forward’ applications.”</p> <p>Source: <i>IL Dept. of Healthcare and Family Svcs., Expansion of Telehealth Services, Informational Notice, Jan. 1, 2010; IL Dept. of Healthcare and Family Svcs., Handbook for Practitioners. Ch. 200, p. 24, Dec. 2018; Handbook for Podiatrists, F-200, p. 27 (Oct. 2016) & Handbook for Encounter Clinic Services pg. 16-17 (Aug. 2016)</i> (Accessed Feb. 2020).</p> <p>Additionally, IL Admin Code encompasses store-and-forward, addressing that a provider at a distant site can “review the medical case without the patient being present.”</p> <p>“Asynchronous Store and Forward Technology” means the transmission of a patient’s medical information from an originating site to the provider at the distant site. The provider at the distant site can review the medical case without the patient being present. An asynchronous telecommunication system in single media format does not include telephone calls, images transmitted via facsimile machines and text messages without visualization of the patient (electronic mail). Photographs visualized by a telecommunication system must be specific to the patient’s medical condition and adequate for furnishing or confirming a diagnosis and/or treatment plan. Dermatological photographs (for example, a photograph of a skin lesion) may be considered to meet the requirement of a single media format under this provision.</p> <p>Source: <i>IL Administrative Code, Title 89, 140.403 (2012).</i> (Accessed Feb. 2020).</p>
	Eligible Services/Specialties	<p>No reference found.</p>



Medicaid Telehealth Reimbursement

Store-and-Forward	Geographic Limits	No reference found.
	Transmission Fee	No reference found.
Remote Patient Monitoring	Policy	<p>IL Medicaid will cover home uterine monitoring with prior approval and when patient meets specific criteria. Payment is only for the items and not for the service.</p> <p>Source: IL Dept. of Healthcare and Family Services, Handbook for Durable Medical Equipment, Chapter M-200, Policy and Procedures for Medical Equipment and Supplies, p. 56 (Sept. 2015). (Accessed Feb. 2020).</p>
	Conditions	<p>Only for home uterine monitoring.</p> <p>Home uterine monitoring</p> <ul style="list-style-type: none"> • Must be at least 24 weeks gestation; gestation of less than 24 weeks may require additional information • Hospitalized for preterm labor at 24-36 weeks • Cessation of labor accomplished by administration of tocolytics (terbutaline, procordia, etc.) • Discharged to home on oral or subcutaneous tocolytics • Multiple gestation pregnancy • History of preterm labor and delivery • Cervical status change (lengthening or dilation) • Cervical effacement • Contraction threshold • Gravida/para <p>Pregnancy-Induced Hypertension Monitor</p> <ul style="list-style-type: none"> • Covered for diagnosis of pregnancy-induced hypertension, previous pregnancy induced hypertension or pre-eclampsia • Hospitalizations for symptoms related to pregnancy induced; i.e., hypertension, headaches, edema in face, hands and feet • Blurred vision • Right upper quadrant pain • 24-hour urine results greater than 300 mg of total protein • Antihypertensive medications • Pre-pregnancy and current blood pressure readings. <p>Will not be covered for patients with a diagnosis of chronic hypertension.</p> <p>Source: IL Dept. of Healthcare and Family Services, Handbook for Durable Medical Equipment, Chapter M-200, Policy and Procedures for Medical Equipment and Supplies, p. 56 (Sept. 2015). (Accessed Feb. 2020).</p>



Medicaid Telehealth Reimbursement

Remote Patient Monitoring	Provider Limitations	No reference found.
	Other Restrictions	No reference found.
Email / Phone / Fax	<p>No reimbursement for telephone. No reimbursement for FAX. No reimbursement for text or email.</p> <p>Source: <i>IL Dept. of Healthcare and Family Services, Handbook for Practitioners Rendering Medical Services, Chapter 200 (Dec 2018). p. 25; Handbook for Podiatrists, F-200, p. 27 (Oct. 2016); & IL Administrative Code, Title 89 ,140.403. (Accessed Feb. 2020).</i></p>	
Consent	No reference found.	
Out of State Providers	<p>For medical services, the provider rendering the service at the distant site can be a physician, physician assistant, podiatrist or advanced practice nurse, who is licensed by the State of Illinois or by the state where the patient is located.</p> <p>For psychiatric services, the provider rendering the service at the distant site must be a physician licensed by the State of Illinois, or by the state where the patient is located, who has completed an approved general psychiatry residency program or a child and adolescent psychiatry residency program.</p> <p>Source: <i>IL Handbook for Practitioners Rendering Medical Services, Chapter 200, p. 26, (Dec. 2018); Handbook for Podiatrists, F-200, p. 27 (Oct. 2016); & Handbook for Encounter Clinic Services pg. 17-18 (Aug. 2016). (Accessed Feb. 2020).</i></p>	
Miscellaneous	<p>Specific documentation requirements apply for telehealth services. See administrative code for details.</p> <p>Source: <i>IL Administrative Code, Title 89 ,140.403(d). (Accessed Feb. 2020).</i></p>	



Private Payer Laws

Definitions	<p>“Telehealth services” means the delivery of covered health care services by way of an interactive telecommunication system.</p> <p>Source: <i>IL Insurance Code. Sec. 356z.22. (Accessed Feb. 2020).</i></p>	
	<p>If an insurer provides coverage for telehealth services, then it shall not:</p> <ul style="list-style-type: none"> • Require in-person contact occur between a health care provider and a patient; • Require the health care provider to document a barrier to an in-person consultation; • Require telehealth use when it is not appropriate; or • Require the use of telehealth when the patient chooses an in-person consultation <p>If an insurer is providing coverage for telehealth services, it must provide coverage for licensed dietitian nutritionists and certified diabetes educators who counsel senior diabetes patients in the senior diabetes patients’ home to remove the hurdle of transportation for senior diabetes patients to receive treatment.</p> <p>Source: <i>IL Insurance Code. Sec. 356z.22. (Accessed Feb. 2020).</i></p>	
	Service Parity	<p>Payers are not required to cover telehealth services, they are only required to meet certain requirements if they choose to do so (see above).</p> <p>Source: <i>IL Insurance Code. Sec. 356z.22. (Accessed Feb. 2020).</i></p>
Payment Parity	<p>No payment parity.</p>	



Definitions

“Telehealth” means the evaluation, diagnosis, or interpretation of electronically transmitted patient-specific data between a remote location and a licensed health care professional that generates interaction or treatment recommendations. “Telehealth” includes telemedicine and the delivery of health care services provided by way of an interactive telecommunications system, as defined in subsection (a) of Section 356z.22 of the Illinois Insurance Code.

Source: *IL Compiled Statutes, Chapter 225, 150/5. (Accessed Feb. 2020).*

Telemedicine means the performance of any of the activities listed in Section 49, including, but not limited to, rendering written or oral opinions concerning diagnosis or treatment of a patient in Illinois by a person in a different location than the patient as a result of transmission of individual patient data by telephonic, electronic, or other means of communication. “Telemedicine” does not include the following:

1. periodic consultations between a person licensed under this Act and a person outside the State of Illinois;
2. a second opinion provided to a person licensed under this Act;
3. diagnosis or treatment services provided to a patient in Illinois following care or treatment originally provided to the patient in the state in which the provider is licensed to practice medicine; and
4. health care services provided to an existing patient while the person licensed under this Act or patient is traveling.

Source: *IL Compiled Statutes, Chapter 225, 60/49.5(c). (Accessed Feb. 2020).*

Under the Department of Public Health, telemedicine means the provision of clinical services to patients by physicians and practitioners from a distance via electronic communications.

Source: *IL Admin. Code, Title 77, Sec. 250.310(a)(8) (Accessed Feb. 2020).*

“Teledentistry” means the use of telehealth systems and methodologies in dentistry and includes patient care and education delivery using synchronous and asynchronous communications under a dentist’s authority as provided under this Act.

Source: *SB 167 (2019 Session). IL Code 225, Sec. 25/4. (Accessed Feb. 2020).*

Consent

No reference found.

Online Prescribing

No reference found.



Member of the Interstate Medical Licensure Compact.

Source: *Interstate Medical Licensure Compact. The IMLC. (Accessed Feb. 2020).*

Member of Psychology Interjurisdictional Compact.

Source: *Psychology Interjurisdictional Compact. Legislative Updates. (Accessed Feb. 2020).*

Must have an IL medical license. An out-of-state person providing a service to a patient in IL through telemedicine submits himself or herself to the jurisdiction of the courts of IL.

Source: *IL Compiled Statutes, Chapter 225, 60/49.5(e) (Accessed Feb. 2020).*

A health care professional may engage in the practice of telehealth in Illinois to the extent of his or her scope of practice as established in his or her respective licensing Act consistent with the standards of care for in-person services. This Act shall not be construed to alter the scope of practice of any health care professional or authorize the delivery of health care services in a setting or in a manner not otherwise authorized by the laws of this State.

“Health care professional” includes physicians, physician assistants, optometrists, advanced practice registered nurses, clinical psychologists licensed in Illinois, prescribing psychologists licensed in Illinois, dentists, occupational therapists, pharmacists, physical therapists, clinical social workers, speech-language pathologists, audiologists, hearing instrument dispensers, and mental health professionals and clinicians authorized by Illinois law to provide mental health services.

Source: *IL Compiled Statutes, Chapter 225, 150/5 & 15/15. (Accessed Feb. 2020).*

