Video Visits During COVID-19 Emergency:
Modifications to Federal Rules & UCSF Policy

18 March 2020 Update

A number of recent changes at the federal and state level have resulting in the lifting of limitations for video visits that were previously in place at UCSF. Please note that these changes are temporary but no end date has been determined:

- **New patients may now be seen via video visit** when clinically appropriate, including Medicare beneficiaries who are not established at UCSF. These encounters (99201-99215) for both new and established patients are now fully reimbursable by CMS; normal co-pays and deductibles may apply. **For guidance on seeing new patients via video visit,** refer to this tip sheet: Video Visits and New Patients.

- **Patients are no longer required to be in the State of California.** CMS is now explicitly permitting providers licensed in any state to provide telehealth services across the country. Because state medical licensing laws contain similar provisions for public health emergencies, **UCSF is lifting this restriction for all patients.**

- **Providers may now responsibly prescribe controlled substances** to patients as part of an initial video visit. (Previously, federal Ryan Haight Act prohibited this.)

- **UCSF video visits should continue to be conducted via Zoom.** The U.S. Department of Health and Human Services (HHS) has indicated they will not impose penalties for HIPAA non-compliance for care provided via less secure technologies. This flexibility will benefit providers across the nation who do not already have compliant telehealth modalities in place. Since we do have well established telehealth workflows at UCSF Health, we can offer the best support and service to both providers and patients who use our existing processes.

  Video visits require a real-time, two-way, audio-video interaction. Telephone calls are insufficient for telehealth reimbursement. We are aware that some providers and patients would like to use Apple FaceTime. We have not evaluated the risks inherent to using FaceTime, which may include exposing the provider's phone number among other things. The federal government has advised that these third-party applications potentially introduce patient privacy risks and providers remain responsible for enabling all available encryption and privacy modes when using such applications. Please direct questions about this policy to privacy@ucsf.edu.

  Support for providers remains available at telehealthresourcecenter@ucsf.edu.

  Patients may be directed to MyChart support at (415) 514-6000 or to https://videovisit.ucsf.edu.

As always, please direct questions to telehealthresourcecenter@ucsf.edu. Additional resources are also available at: https://telehealth.ucsf.edu

Thank you to everyone for your continued efforts to see our patients in the safety of their homes.