

Telehealth Update April 30, 2020

FIRST ROUND FLEXIBILITIES: CMS

- CMS to pay for 80 additional **telehealth codes**; home visits, ED visits, home visits and therapy services. Providers can waive copayments for all telehealth services for Medicare beneficiaries.
- **Virtual Check-ins: (G2012 & G2010)** extended to **new** and established patients.
- **Telephone Services:** CMS will reimburse for physician telephone E&M (CPT 99441-99443) and telephone assessment and management by qualified nonphysician (CPT 98966-98968)
- **E-visits:** LCSW, Clinical Psychologist, PT, OT and SLP can provide E-visits G2061-G2063 to established patients only. Must be patient initiated and established patients only.
- **Remote Patient Monitoring:** can be provided to patients with acute and chronic conditions, including patient with only one disease.

Additional Considerations:

- **Removal:** Frequency Limitations on Medicare:
 - CPT 99231-99233 – subsequent Inpatient
 - CPT 99307-99310 – subsequent skilled nursing
 - CPT G0508-G0509 - Critical care consult
- **Supervision Requirements:** CMS is allowing physicians to supervise their clinical staff using virtual technologies when appropriate, instead of requiring in-person presence.
- **Waivers “Stark Law”:** CMS implementing waivers exempting providers from sanctions for noncompliance of certain Stark Law rules, allowing certain referrals and submission of related claims that would otherwise have been in violation.

Additional information regarding waivers and rule changes:

<https://www.cms.gov/newsroom/fact-sheets/additional-backgroundsweeping-regulatory-changes-help-us-healthcare-system-address-covid-19-patient>

SECOND ROUND FLEXIBILITIES: CMS

- RHC’s and FQHC’s allowed to furnish distant site telehealth services and must use G2025 to identify telehealth services beginning **January 27, 2020** (COVID PHE)
- Claims Requirements for **RHC** distant site services

Services Jan 27, 2020 - June 30, 2020

- HCPCS code G2025
- Modifier CG (required)
- Modifier 95 (optional)
- Revenue code 052X

Services on/after July 1, 2020

- HCPCS code G2025
- Modifier 95 (optional)
- Revenue Code 052X

- Claims Requirements for FQHC distant site services
 - Must report FQHC PPS specific payment code (G0466, G0467, G0468, G0469 or G0470) No modifier needed
 - Must report HCPCS/CPT code describing service rendered along with modifier 95
 - Must report G2025 with modifier 95

Services Jan 27, 2020 - June 30, 2020

- HCPCS code G2025
- Modifier CG (required)
- Modifier 95 (optional)
- Revenue code 052X

Services on/after July 1, 2020

- HCPCS code G2025
- Modifier 95 (optional)
- Revenue Code 052X

- RHCs and FQHCs append CS modifier – claims will be paid with coinsurance applied and MAC will automatically reprocess claims beginning on July 1, 2020
 - Should not collect coinsurance from beneficiaries if it is waived
- During PHE: RHC’s and QHC’s can furnish any telehealth services that is approved as a Medicare telehealth service under PFS. *Effective March 1, 2020 this includes CPT 99441-99443, audio only telephone E&M services by using HCPCS G2025*