

Telehealth During vs. After PHE

Telehealth billing <u>DURING</u> the public health emergency (PHE)		Telehealth billing <u>AFTER</u> the public health emergency (PHE)
Approved telehealth codes	For a complete list of approved telehealth codes, visit: https://www.cms.gov/Medicare/Medicare-General-Information/Telehealth/Telehealth-Codes	
Place of service	For use through December 31, 2024 11, 19, or 22 - The place of service where the provider normally sees patient OR 02 if provider only sees telehealth patients OR 10 for some commercial carriers (contact your local carriers)	Starts January 1, 2025 POS 02 POS 10 (available for behavioral health and certain services allowed in patient's home)
Modifiers	For use through December 31, 2024 <ul style="list-style-type: none"> 95 for Medicare and most commercial payors 93 Synchronous telemedicine service rendered via telephone or other real-time interactive audio-only telecommunications system CR: waives certain DME and copay/coinsurance GQ: for distant site claim provided in the demonstration program in Alaska and Hawaii GT is no longer required for professional claims – but some commercial payors use GT instead of 95 	Starts January 1, 2025 <ul style="list-style-type: none"> 95 for Medicare and most commercial payors 93 Synchronous telemedicine service rendered via telephone or other real-time interactive audio-only telecommunications system GQ: for distant site claim provided in the demonstration program in Alaska and Hawaii GT is no longer required for professional claims – but some commercial payors use GT instead of 95
Originating site (where patient is located)	For use through December 31, 2024 No site restrictions – patient's home can be used for a telehealth visit	Starts January 1, 2025 Originating site must be either*: 1) a county outside of a Metropolitan Statistical Area (MSA) OR 2) within a Rural Health Professional Shortage Area (HPSA) AND Conducted at an eligible originating site
Eligible originating sites	For use through December 31, 2024 No site restrictions during the PHE	Starts January 1, 2025 <ul style="list-style-type: none"> Physician and practitioner offices Hospitals Critical Access Hospitals (CAH) Rural Health Clinics (RHC) Federally Qualified Health Centers (FQHC) Hospital-based or CAH-based Renal Dialysis Centers (including satellites) Skilled Nursing Facilities (SNF)

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		<ul style="list-style-type: none"> Community Mental Health Centers (CMHC) Mobile Stroke Units (for treatment and diagnosis of acute stroke) Patient home for <ul style="list-style-type: none"> ESRD if patient receiving home dialysis Substance/Opioid abuse and co-occurring mental health disorders if patient in treatment
Eligible providers	For use through December 31, 2024 <ul style="list-style-type: none"> Physician Nurse Practitioner (NP) Physician Assistant (PA) Clinical Nurse Specialist (CNS) Nurse Midwife Certified Registered Nurse Anesthetist (CRNA) Psychologist (CP) Clinical Social Worker (CSW) Registered Dietician (RD) Physical Therapist (PT), Occupational Therapist (OT), Speech Language Pathologist (SLP) Rural Health Clinic (RHC) Federally Qualified Health Center (FQHC) 	Starts January 1, 2025 <ul style="list-style-type: none"> Physician Nurse Practitioner (NP) Physician Assistant (PA) Clinical Nurse Specialist (CNS) Nurse Midwife Certified Registered Nurse Anesthetist (CRNA) Clinical Psychologist (CP) Clinical Social Worker (CSW) Registered Dietician (RD) Nutritional professionals
Patient Consent	No clearly defined end date May be verbally obtained at the time of the telehealth visit	No clearly defined end date – would suggest documenting within the record once PHE end. Must be documented within the electronic record
HIPAA compliant telehealth platform required?	ENDS LAST DAY OF PHE May use FaceTime, Skype, Zoom, and other video communication to conduct telehealth visit with the patient. However – public facing platforms (e.g., Facebook Live and TikTok) are not approved platforms.	STARTS DAY AFTER PHE ENDS HIPAA compliant platforms are required
Audio-only visits coverage	For use through December 31, 2024 Codes 99441-99443 along with 91 other codes on the list are approved as telephone only services (See column D on the CMS list)	Starts January 1, 2025 Codes 99441-99443 are no longer covered once the PHE has ended. *

*Behavioral health has additional permanent flexibilities.