

The Public Health Emergency and COVID-19 Telehealth Services

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Today's Presenters

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Objectives

- To make the provider community aware of the current guidelines for the PHE and COVID-19 telehealth services

Agenda

- Staying Informed
- Telehealth Services
 - What's New for 2022

Staying Informed

Suggested Actions

- During the COVID-19 Public Health Emergency, information and instructions may change
 - [U.S. Department of HHS Public Health Emergency](#)
- It's vital to receive the latest information – take the following steps to ensure access to the latest updates
 - Sign up for listserv messaging from
 - [CMS Listserv](#) and
 - [National Government Services Email Updates](#)
- Routinely check
 - CMS [Current Emergencies](#) webpage
 - NGS [COVID-19 News](#) page

CMS Website

The screenshot shows the CMS.gov website homepage. At the top left is the CMS.gov logo with the tagline "Centers for Medicare & Medicaid Services". To the right are links for "About CMS" and "Newsroom", and a search bar labeled "Search CMS.gov". Below the header is a navigation menu with links for Medicare, Medicaid/CHIP, Medicare-Medicaid Coordination, Private Insurance, Innovation Center, Regulations & Guidance, Research, Statistics, Data & Systems, and Outreach & Education.

The main content area features a "Strategic Plan" section. On the left, a vertical list of sub-topics includes: Advance Equity, Expand Access, Engage Partners, Drive Innovation, Protect Programs, and Foster Excellence. The main heading "Strategic Plan" is followed by a paragraph: "CMS serves the public as a trusted partner and steward, dedicated to advancing health equity, expanding coverage, and improving health outcomes." Below this is a "Learn more" button with a right-pointing arrow. To the right of the text is a photograph of a man and a woman in business attire looking at a tablet together.

Below the Strategic Plan section is a "Coronavirus Disease 2019" section. It contains the text: "Find program guidance and information about our response to COVID-19 and current non-COVID emergencies." and a "Learn More" button with a right-pointing arrow.

NGSMedicare Website



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Education > Medicare Topics

COVID-19

COVID-19

[Accelerated and Advanced Payment Program](#)

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[Claim Billing Guidance](#)

[COVID-19 Vaccine and Monoclonal Antibody](#)

COVID-19

The 2019 Novel Coronavirus (COVID-19) was declared a PHE on 3/13/2020. At the time of this update, the PHE remains in effect. Please visit [CMS' Current emergencies web page](#) for complete details on the PHE.

At National Government Services, the health and well-being of our beneficiaries, providers, our associates and communities is our top priority.

CMS' COVID-19 web page is a toolkit for providers who are looking for information on the COVID vaccines, including enrollment and billing of the vaccine administration. There is also a comprehensive [CMS Frequently Asked Questions to Assist Medicare Providers](#) document to help you with your questions and concerns.



Modifier CR

- Modifier CR (catastrophe/disaster related)
 - Used on professional and outpatient institutional claims
 - CR modifier is not required on telehealth services
- Mandatory coding for any claim for which Medicare payment is conditioned on the presence of a “formal waiver” including the Section 1135 waiver
- Used to identify claims that are/may be impacted by specific payer/health plan policies related to a national or regional disaster

CS Modifier

- CS modifier waives cost sharing requirements
- MLN Matters® [SE20011 Revised: Medicare FFS Response to the PHE on COVID-19](#)
- DOS on/after 3/18/2020: Cost-sharing does not apply for COVID-19 testing-related services, which are medical visits
 - Append CS modifier to E/M service performed
 - When E/M service leads to COVID-19 testing
 - Allows E/M to be paid at 100% of the fee schedule

Telehealth Services - What's New for 2022

CMS List of Telehealth Services



Centers for Medicare & Medicaid Services

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- Private Insurance
- Innovation Center
- Regulations & Guidance
- Research, Statistics, Data & Systems
- Outreach & Education

Home > Medicare > Telehealth > List of Telehealth Services

Telehealth

Submitting a Request

Request for Addition

CMS Criteria for Submitted Requests

Review

List of Telehealth Services

List of services payable under the Medicare Physician Fee Schedule when furnished via telehealth.

[List of Telehealth Services for Calendar Year 2022 \(ZIP\) - Updated 06/17/2022](#)



Medicare Telehealth Originating Site Facility Fee, Q3014

Telehealth Services List- Sample

LIST OF MEDICARE TELEHEALTH SERVICES effective June 16, 2022 - updated June 16, 2022				
Code	Short Descriptor	Status	Can Audio-only Interaction Meet the Requirement	Medicare Payment Limitation
90838	Psytx w pt w e/m 60 min		Yes	
90839	Psytx crisis initial 60 min		Yes	
90840	Psytx crisis ea addl 30 min		Yes	
90845	Psychoanalysis		Yes	
90846	Family psytx w/o pt 50 min		Yes	
90847	Family psytx w/pt 50 min		Yes	
90853	Group psychotherapy		Yes	
90875	Psychophysiological therapy	Temporary Addition for the PHE for the COVID-19 Pandemic—Added 4/30/20		Non-cov
90901	Biofeedback train any meth	Temporary Addition for the PHE for the COVID-19 Pandemic—Added 6/16/22		
90951	Esrd serv 4 visits p mo <2yr			
90952	Esrd serv 2-3 vsts p mo <2yr			
90953	Esrd serv 1 visit p mo <2yrs	Available up Through December 31, 2023		
90954	Esrd serv 4 vsts p mo 2-11			
90955	Esrd srv 2-3 vsts p mo 2-11			
90956	Esrd srv 1 visit p mo 2-11	Available up Through December 31, 2023		
90957	Esrd srv 4 vsts p mo 12-19			
90958	Esrd srv 2-3 vsts p mo 12-19			

Telehealth

- Services added to the Medicare telehealth services list as a result of the PHE will be retained on a temporary Category 3 basis until the end of CY 2023
- This will allow stakeholders to analyze and consider permanent addition of these services

MM12549: CY2022 Telehealth Update Medicare Physician Fee Schedule

- Two additional modifiers for CY 2022 relating to telehealth mental health services
- An update to the Telehealth Services List
- Other changes to the MPFS for telehealth
- Effective Date: 1/1/2022
- Implementation Date: 4/1/2022
- MLN Matters® [MM12549: CY2022 Telehealth Update Medicare Physician Fee Schedule](#)

Two Additional Modifiers for CY 2022 for Telehealth Mental Health Services

- FQ - A telehealth service was furnished using real-time audio-only communication technology
 - Two exceptions to audio-visual technology rule have been made for mental health services furnished by practitioners who have the capability to furnish two-way, audio/video communications:
 - Beneficiary is not capable of two-way audio/video technology
 - Beneficiary does not consent to the use of two-way, audio/video technology
- FR - A supervising practitioner was present through a real-time two-way, audio/video communication technology

Telehealth – Mental Health

- After the PHE, mental health services will continue to be permissible with the patient's home as the originating site
- The mental health practitioner furnishing such telehealth services must have furnished both
 - An in-person, non-telehealth service to the beneficiary within the six-month period before the date of service of a telehealth service and an in-person, non-telehealth service to the beneficiary must occur at 12-month intervals for subsequent care
- The practitioner must document any valid exception to this rule in the medical record
- The pre and post face-to-face visit for telehealth mental health services may be performed by a clinician's same-specialty, same-group colleague if the original practitioner is unavailable

MM12427: New/Modifications to the Place of Service Codes for Telehealth

- Revising the description of existing POS code 02
 - Telehealth provided other than in patient's home
- Adding new POS code 10
 - Telehealth provided in patient's home
 - Medicare has not identified a need for new POS code 10
 - Medicare providers should continue to use the Medicare billing instructions for telehealth claims in [CMS IOM Publication 100-04, Medicare Claims Processing Manual, Chapter 12, Section 190](#)
- Effective Date: 1/1/2022
- Implementation Date: 4/4/2022
- MLN Matters® [MM12427: New/Modifications to the Place of Service \(POS\) Codes for Telehealth](#)

Reminders for Telehealth Services

- On/after 3/1/2020 and for duration of PHE
 - Bill audio or audio/video telehealth service with modifier 95 (professional telehealth service from a distant site)
 - POS equal to what it would have been (if were performed face-to-face) in the absence of a PHE
 - CR modifier not required on telehealth services
 - Telehealth services are professional services billed as distant site

Telephone Services

- 99441-99443
 - Telephone E/M service by a practitioner or qualified health care professional
 - **4/30/2020 added to telehealth services; use modifier 95**
 - Physicians (including Osteopaths, Podiatrists, and Optometrists), Dentists, Nonphysician Practitioners (including Nurse Practitioner, Clinical Nurse Specialist, Physician Assistant, Certified Nurse Midwife) and Maxillofacial Surgeon
- 98966-98968
 - Telephone assessment and management service
 - **Not on the CMS list of telehealth codes**
 - Clinical Psychologists, PT/OT/SLP, Optometrists, Nonphysician practitioners (including Nurse Practitioner, Clinical Nurse Specialist, Physician Assistant, Certified Nurse Midwife), LCSWs, Registered Dietitians (RDs) and Nutrition Professionals (NPs)

Telehealth Documentation

- Same as any face-to-face patient encounter, except a statement needed indicating service was telehealth, along with
 - Patient location
 - Provider location
 - Names of all persons participating in the telemedicine service and their role in the encounter
- Time-based services, document start/stop time or total time
- Teaching physician may use audio/video telecommunications during key portions of service

Thank You!

- Follow-up email
 - Attendees will be provided a Medicare University Course Code
- Questions?

