

# Billing Telehealth in FQHCs and RHCs

3/12/2025

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# Objective

After this session, attendees will be able to properly submit telehealth claims to Medicare for FQHC and RHC providers.

# Today's Presenters

- Provider Outreach and Education Consultants
  - Mimi Vier
  - Andrea Freibauer





# Agenda

- [Telehealth Services](#)
- [Resources](#)
- [Q&A](#)

# Telehealth Services

# What is Telehealth?

- Services using interactive audio and video telecommunications system that permits real-time communication between provider and beneficiary
  - Medicare pays for limited number of Part B services furnished in this manner
  - Substitutes for in-person encounter



# Interactive Telecommunications System

- Definition
  - Multimedia communications equipment that includes
    - Audio and video equipment permitting two-way, real-time interactive communication between beneficiary and distant site physician/practitioner
- Requirement
  - Distant site physicians/practitioners have technical capability to use interactive telecommunications system including two-way, real-time, interactive audio and video communications at time that audio-only telehealth service furnished



# Interactive Telecommunications System – Audio Only

- May include two-way, real-time, audio only communication
  - New or established patients
  - Distant site physician/practitioner using interactive telecommunications system
  - Beneficiary in their home and either not capable of or does not consent to use of video technology
- Bill with modifier FQ or 93
  - MLN® Matters: [SE22001 Revised - Mental Health Visits via Telecommunications for Rural Health Clinics & Federally Qualified Health Centers](#)

# Telehealth Extension 3/31/2025

- [Section 3207 of the American Relief Act, 2025](#) extended telehealth waivers until 3/31/2025
  - Pay claims through 3/31/2025 with the same flexibilities as 2024
  - May receive telehealth service regardless of geographic location
  - Beneficiaries may continue to receive telehealth services at home
  - No practitioner restrictions
  - In-person mental health services requirement delayed until 1/1/2026
- [Telehealth FAQ 2025](#) (published 1/8/2025)

# Originating Site

- FQHC/RHC is originating site (where beneficiary located)
- Through 3/31/2025
  - Beneficiaries can get telehealth wherever they are located
  - No geographic location restrictions
- On or after 4/1/2025
  - Non-behavioral health
    - Reverts to prior regulations for originating site requirements and geographic location restrictions
  - Behavioral or mental services
    - All beneficiaries can continue to get telehealth wherever located
    - No originating site requirements or geographic location restrictions

# Billing Originating Site

- FQHC and RHC
  - Separately billable, no other visit reported
  - Revenue code 0780
  - HCPC Q3014
- Subject to Part B deductible and coinsurance
- Payment \$31.01 (2025)

# Distant Site

- Where physician or practitioner provides telehealth from (including their home)
- Through 3/31/2025
  - All providers eligible to bill Medicare for professional services can provide distant site telehealth
- On or after 4/1/2025
  - Reverts to original regulations unless Congress enacts additional legislation

# Billing Distant Site

- Services on telehealth services list for which coinsurance waived
  - Report CS modifier
- Nonbehavioral health services
  - Report HCPC G2025
  - Do not report HCPC from telehealth services list

[List of Telehealth Services for Calendar Year 2025](#)

# Medicare Telehealth Services Categorized

- Category Column added 11/1/2023
  - Provisional codes
    - May be granted permanent status or removed in future
    - No set time frame for reevaluation
    - Services monitored for patient safety
    - Will never be assigned when improbable that code would ever achieve permanent status
  - Permanent codes
    - On CMS telehealth list before COVID-19 PHE extensions and waivers
    - Will remain on list of telehealth services
- Audio-only column removed

# Mental Health Telehealth Services

- Continued indefinitely for purpose of diagnosis, evaluation, or treatment of mental health disorders
- Originating sites expanded to include
  - Beneficiary home
  - Temporary lodging (hotels, homeless shelters, nursing homes)
- In-person visit requirement delayed until 1/1/2026



# Mental Health Audio-Only Telehealth

- Audio-only communication permitted for new or established patients in their home
- Must meet one or more of the following:
  - No technical capacity for two-way, audio-visual communication
  - No availability of real-time audio and visual interactive telecommunication
  - Does not consent to use of two-way, audio/video technology
- Medical record documentation must support reason for using audio-only communication

# Billing Mental Health Telehealth - FQHC

- Revenue code 0900
- HCPC G0469 or G0470 with modifier
- Modifiers
  - FQ or 93 – audio-only communication
  - 95 – audio-video communication
- FQHC [qualifying mental health visit code](#)

# Billing Mental Health Telehealth – RHC

- Revenue code 0900
- CPT 90834 (or other qualifying mental health visit code)
- Modifiers
  - CG – identifies qualifying visit
  - FQ or 93 – audio-only communication

# Telehealth Documentation

- Same as any face-to-face beneficiary encounter, along with
  - Statement indicating telehealth service
  - Beneficiary location
  - Provider location
  - Names of all persons participating in service and their role in encounter
- Time-based services
  - Document start/stop time or total time

# References and Resources

# CMS References and Resources

- [Telehealth FAQ Calendar Year 2025](#)
- [Telehealth](#) page
- [Federally Qualified Health Centers \(FQHC\) Center](#)
- [Rural Health Clinics Center](#)
- [CY 2025 Medicare Physician Fee Schedule \(CMS-1807-F\)](#)

# IOM and MLN<sup>®</sup> References and Resources

- CMS IOM Publication 100-04, *Medicare Claims Processing Manual*
  - [Chapter 9, Section 80](#)
  - [Chapter 12, Section 190](#)
- CMS MLN<sup>®</sup> Publications
  - Fact Sheet: [Telehealth Services \(MLN901705\)](#)
  - Special Edition Article [SE22001 Revised - Mental Health Visits via Telecommunications for Rural Health Clinics & Federally Qualified Health Centers](#)
  - Booklet: [Federally Qualified Health Center \(MLN006397\)](#)
  - Booklet: [Rural Health Clinics \(MLN006398\)](#)

# Other References and Resources

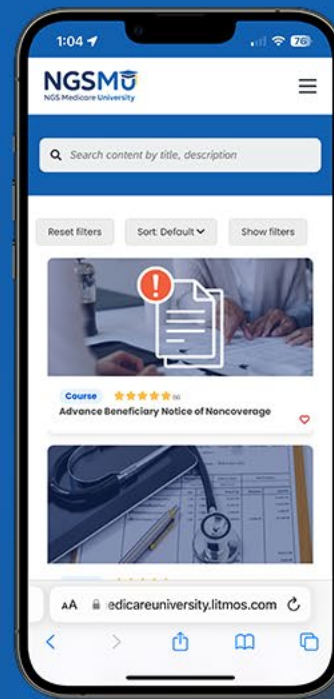
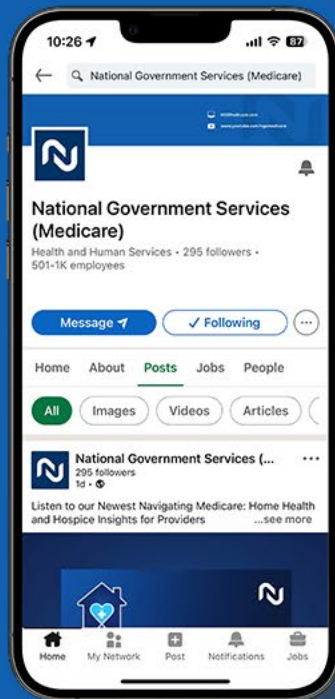
- Telehealth HHS website
  - [Billing and Coding Medicare Fee-For-Service claims](#)
  - [Telehealth policy updates for RHCs and FQHCs](#)
- NGS website
  - [Telehealth Services](#) (pre-PHE requirements)
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# Questions?

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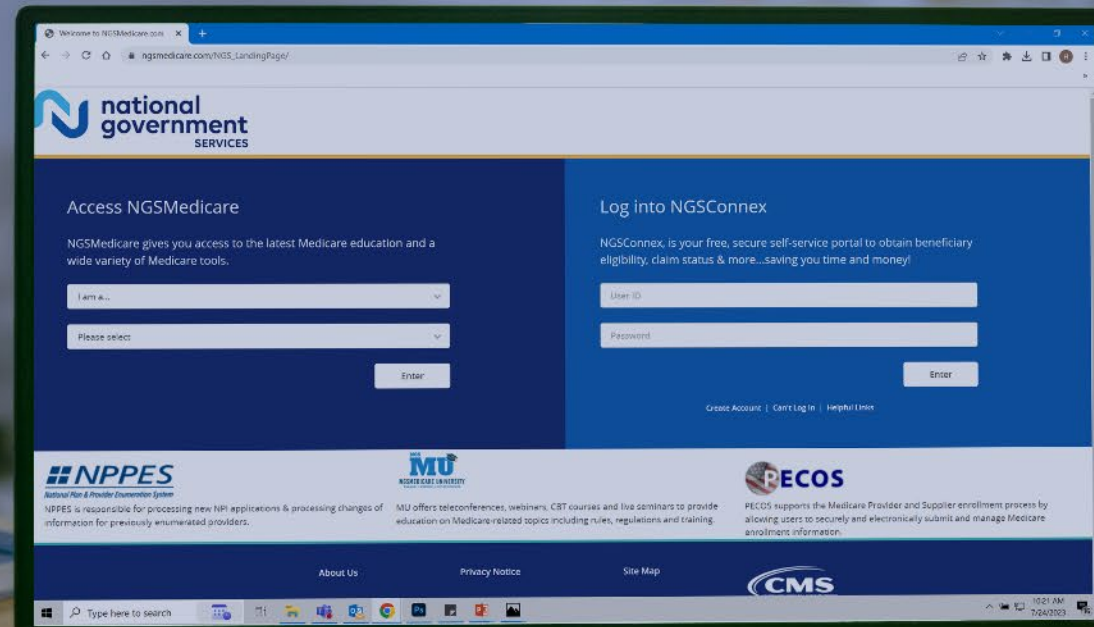


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