

TELEHEALTH

**Flexibility During the COVID-19 Crisis
What You Need to Know**



Background

The current COVID-19 crisis is accelerating the adoption of new care delivery models to reduce strain on US healthcare institutions. That includes rapid advancements in the world of telemedicine. Virtual care resources have proven invaluable to healthcare workers managing rising COVID-19 patient volumes alongside traditional care delivery. Regulatory agencies have taken note and are implementing broad policy changes aimed at relaxing barriers to virtual care delivery.

On March 30, 2020, the Administration announced sweeping changes to Medicare in response to the COVID-19 emergency as part of the Coronavirus Aid, Relief, and Economic Security (CARES) Act. The Centers for Medicare & Medicaid Services (CMS) have broadened access to Medicare telehealth services during this public health emergency, implementing new temporary regulatory waivers and rules designed to equip the US health system with maximum flexibility to respond to the COVID-19 pandemic.

Here is what you need to know.



CMS Telehealth Policy Updates

1 New Medicare Telehealth Services

CMS will allow over 80 additional telehealth services for Medicare patients. New codes include:

- Emergency Department Visits, Levels 1-5
(CPT codes 99281-99285)
- Initial and Subsequent Observation and Observation Discharge Day Management
(CPT codes 99217- 99220; CPT codes 99224- 99226; CPT codes 99234- 99236)
- Initial Hospital Care and Hospital Discharge Day Management
(CPT codes 99221-99223; CPT codes 99238- 99239)
- Initial Nursing Facility Visits, All Levels (Low, Moderate, and High Complexity), and Nursing Facility Discharge Day Management
(CPT codes 99304-99306; CPT codes 99315-99316)
- Critical Care Services
(CPT codes 99291-99292)
- Domiciliary, Rest Home, or Custodial Care Services, New and Established Patients
(CPT codes 99327- 99328; CPT codes 99334-99337)
- Home Visits, New and Established Patients, All Levels
(CPT codes 99341- 99345; CPT codes 99347- 99350)
- Inpatient Neonatal and Pediatric Critical Care, Initial and Subsequent
(CPT codes 99468- 99473; CPT codes 99475- 99476)
- Initial and Continuing Intensive Care Services
(CPT code 99477- 994780)
- Care Planning for Patients with Cognitive Impairment
(CPT code 99483)
- Psychological and Neuropsychological Testing
(CPT codes 96130- 96133; CPT codes 96136- 96139)
- Therapy Services, Physical and Occupational Therapy, All Levels
(CPT codes 97161- 97168; CPT codes 97110, 97112, 97116, 97535, 97750, 97755, 97760, 97761, 92521- 92524, 92507)
- Radiation Treatment Management Services
(CPT code 77427)

CMS Telehealth Policy Updates

2 Billable Telehealth Services Expanded to New Providers

Billable Medicare telehealth services have been extended to:

- licensed clinical social workers
- clinical psychologists
- physical therapy
- occupational therapy
- speech language pathology

These providers are also eligible for reimbursement for e-visits (HCPCS codes G2061-G2063).

Home Health Agencies can provide telehealth services within the 30-day episode of care, if it is part of the plan of care and services do not replace needed in-person visits.

Hospice can now deliver routine home care services and face-to-face encounters for purposes of patient recertification via telehealth.



Physicians and practitioners are permitted to perform in-person visits for **nursing home** residents, including telehealth visits, where appropriate.

Inpatient rehabilitation physicians may use telehealth services to conduct the required 3 physician visits per week.

CMS Telehealth Policy Updates

3 Telehealth Service Parity

Providers can report POS codes that are typically used for in-person services when billing for Medicare telehealth services. CPT telehealth modifier 95 should be applied to claim lines for services delivered via telehealth during the COVID-19 public health emergency.

4 Virtual Check-Ins and Remote Monitoring Expanded to New Patients

Virtual check-ins previously reserved for established patients can now be used for new patients, as well (HCPCS code G2010, G2012). Remote patient monitoring (RPM) (CPT codes 99091, 99457-99458, 99473- 99474, 99493-99494) can be used for both acute and chronic conditions, including patients with only one disease. This includes monitoring oxygen saturation levels using pulse oximetry.

5 Audio-only Telephone E/M coverage

Providers can offer new and established patients certain services by telephone during the COVID-19 public health emergency via separate payment for CPT codes 98966-98968 and 99441-99443.



CMS Telehealth Policy Updates

6 Telehealth frequency limitations lifted

Prior limits to the number of times certain services can be provided via telehealth have been eliminated, including subsequent inpatient visits, subsequent skilled nursing facility visits and critical care consults. End-stage renal disease (ESRD) services no longer require one “hands on” visit per month and may use telehealth to meet clinical examination requirements.

7 Physician Supervision Flexibility

Clinical supervision can now be provided virtually for services that require direct supervision by a physician or other practitioner.

8 Beneficiary Consent

Annual Medicare beneficiary consent, inclusive of services delivered virtually, can be obtained at the same time, not necessarily before visits.



The CARES Act also provides CMS with additional authority to expand Medicare telehealth services for Federally Qualified Health Centers (FQHCs) and Regional Health Centers (RHCs).

CMS is allowing health systems and hospitals to expand services to locations beyond their existing walls to help address the urgent need to expand care capacity and develop sites dedicated to COVID-19 treatment. These initiatives significantly reduce barriers to care during this critical time.

CARES ACT
COVID-19

Additional Resources

Caregility would like to thank the American Telemedicine Association (ATA) for its efforts to disseminate details shared here on new federal policy guidelines related to telehealth use during the COVID-19 outbreak. You can view additional ATA COVID-19 news, information and resources here:

<https://info.americantelemed.org/covid-19-news-resources>

View details on additional COVID-19 related flexibilities impacting healthcare providers here:

<https://www.cms.gov/files/document/covid-flexibilities-overview-graphic.pdf>

CMS Coronavirus Resource Overview:

<https://www.cms.gov/About-CMS/Agency-Information/Emergency/E-PRO/Current-Emergencies/Current-Emergencies-page>

CMS COVID-19 Fact Sheet:

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

COVID-19 Rapid Response Telehealth Solutions

Contact Caregility to explore ways your healthcare organization can deliver virtual care to patients while keeping healthcare workers safe.

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