



Temporary Medicare Telehealth Guidance

RE: EXPANDED MEDICARE TELEHEALTH CODES WITH FLEXIBILITIES FOR AUDIO-ONLY SERVICES FOR DURATION OF THE COVID-19 PUBLIC HEALTH EMERGENCY (PHE)

RETROACTIVE TO 3/1/20

May 20, 2020

Dear Valued Provider and Staff,

The Centers for Medicare & Medicaid Services (CMS) published a [Second Interim Final Rule](#) (05/08/2020) with expanded flexibilities that will allow individuals to receive care during the COVID-19 Public Health Emergency (PHE) without jeopardizing their health or the health of those providing the services. In accordance with the latest rules, we want to update you on Beacon's temporary Medicare telehealth policy for the duration of the COVID-19 Public Health Emergency (PHE).

In the first Interim Final Rule, CMS established separate payment for audio-only telephone evaluation and management services (CPT codes 99441, 99442 and 99443). In this second Interim Rule CMS is broadening that list to include many more behavioral health services. CMS is also **increasing payments for these telephone visits** to match payments for similar office and outpatient visits (99212-99214)¹.

CMS is expanding the Medicare Telehealth List with more covered codes and the flexibility to provide many **telehealth services by audio only if/when audio-video is not possible** —see updated list of behavioral health codes attached to this communication and see the complete list [here](#). Providers should **bill** as if the service was furnished **in person with the POS Code of where the service would have occurred in person and with modifier 95 to indicate telehealth**.

Hospitals

Through telecommunication technology **hospitals*** may provide behavioral health and education services furnished by hospital-employed counselors or other health professionals who cannot bill Medicare directly. These hospital-only, remote outpatient therapy services **include Partial Hospitalization Program (PHP)** services. They may now be delivered in temporary expansion locations, including patients' homes, so long as such locations have been made provider-based to the hospital. When the patient is registered as an outpatient, PHP services furnished by hospital staff in that location are considered to be furnished in the hospital. That includes:

HCPSC Code	Descriptor	HCPSC Code	Descriptor
90785	Psytx complex interactive	G0410	Grp psych partial hosp 45-50
90832	Psytx pt&/family 30 minutes	G0411	Interactive group psychotherapy, parti
90834	Psytx pt&/family 45 minutes	G0176	Opps/php;activity therapy
90837	Psytx pt&/family 60 minutes	G0177	Opps/php; train & educ serv
90847	Family psytx w/patient		

***Notes:** During the COVID-19 PHE, hospital or community mental health center (CMHC) facility clinical staff can furnish services remotely to patients via telecommunications technology in a temporary expansion location, that may include the patient's home to the extent it is made provider-

¹ CMS did not add codes 98966-98968 to the telehealth services list or increase the payment rates for these codes (audio-only telephone services furnished by non-physician practitioners who cannot independently bill for E/M services).



based to the hospital or an extension of the CMHC. The above table lists the PHP services that can be furnished in this manner during the COVID-19 PHE. Hospitals may be reimbursed for the originating site facility fee associated with the telehealth service (using code Q3014).

Although these services can be furnished remotely, all other PHP requirements are unchanged and still in effect, including that all services furnished under the PHP still require an order by a physician, must be supervised by a physician, must be certified by a physician, and must be furnished in accordance with coding requirements by a clinical staff member working within his or her scope of practice. Only in the case that both audio and video are not possible can the service be furnished exclusively with audio.

When these services are furnished by hospital or CMHC clinical staff within their scope of practice, the hospital or CMHC should bill for these services as if they were furnished in the hospital or CMHC and consistent with any specific requirements for billing Medicare during the COVID-19 PHE. When these services are provided by clinical staff of the physician or other practitioner and furnished incident to their professional services, and are not provided by clinical staff of the hospital or CMHC, the hospital or CMHC would not bill for the services.

Rural Health Clinics and Federally Qualified Health Centers

Rural Health Clinics and Federally Qualified Health Centers may furnish distant site Medicare telehealth services. Distant site telehealth services can be furnished by any health care practitioner working for the RHC or the FQHC within their scope of practice. Practitioners can furnish distant site telehealth services from any location, including their home, during the time that they are working for the RHC or FQHC, and can furnish any Medicare telehealth service.

Medical Necessity

CMS reiterates in the Rule that they are not waiving medical necessity requirements. Therefore, **items and services must continue to be furnished and ordered on a reasonable and necessary basis and the medical record must be sufficient to support payment for the services billed** (i.e., the services were actually provided, were provided at the level billed, and were medically necessary).

For answers to common questions about expanded Medicare telehealth services during the COVID-19 PHE see this [Medicare Learning Network YouTube video](#).

Additional guidance is located on the CMS website <https://www.cms.gov/about-cms/emergency-preparedness-response-operations/current-emergencies/coronavirus-waivers>.

LIST OF MEDICARE TELEHEALTH SERVICES

Temporary Addition for the PHE for the COVID-19 Pandemic Added 3/30/2020
Updated with Audio-Only Coverage on 4/30/2020

Code	Short Descriptor	Audio-only During COVID-19 PHE?	Code	Short Descriptor	Audio-only During COVID-19 PHE?
90853	Group psychotherapy	Yes	96136	Psycl/nrpsyc tst phy/qhp 1s	Yes
96130	Psycl tst eval phys/qhp 1st	Yes	96137	Psycl/nrpsyc tst phy/qhp ea	Yes
96131	Psycl tst eval phys/qhp ea	Yes	96138	Psycl/nrpsyc tech 1st	Yes
96132	Nrpsyc tst eval phys/qhp 1st	Yes	96139	Psycl/nrpsyc tst tech ea	Yes
96133	Nrpsyc tst eval phys/qhp ea	Yes			

Temporary Addition for COVID-19 PHE - Added 4/30/2020

Code	Short Descriptor	Audio-only During COVID-19 PHE?	Code	Short Descriptor	Audio-only During COVID-19 PHE?
96110	Developmental screen w/score		97157	Mult fam adapt bhv tx gdn	
96113	Devel tst phys/qhp ea addl		97158	Grp adapt bhv tx by phy/qhp	
96121	Nubhvl xm phy/qhp ea addl hr	Yes	97530	Therapeutic activities	
96127	Brief emotional/behav assmt	Yes	99324	Domicil/r-home visit new pat	
96158	Hlth bhv ivntj indiv 1st 30	Yes	99325	Domicil/r-home visit new pat	
97150	Group therapeutic procedures		99326	Domicil/r-home visit new pat	
97151	Bhv id assmt by phys/qhp		99441	Phone e/m phys/qhp 5-10 min	Yes
97152	Bhv id suprt assmt by 1 tech		99442	Phone e/m phys/qhp 11-20 min	Yes
97153	Adaptive behavior tx by tech		99443	Phone e/m phys/qhp 21-30 min	Yes
97154	Grp adapt bhv tx by tech		0373T	Adapt bhv tx ea 15 min	
97155	Adapt behavior tx phys/qhp		0362T	Bhv id suprt assmt ea 15 min	
97156	Fam adapt bhv tx gdn phy/qhp				

Permanent Medicare Telehealth Codes Updated with Audio-Only Coverage on 4/30/2020

Code	Short Descriptor	Audio-only During COVID-19 PHE?	Code	Short Descriptor	Audio-only During COVID-19 PHE?
90785	Psytx complex interactive	Yes	90847	Family psytx w/pt 50 min	Yes
90791	Psych diagnostic evaluation	Yes	96116	Nubhvl xm phys/qhp 1st hr	Yes
90792	Psych diag eval w/med srvc	Yes	99354	Prolong e&m/psytx serv o/p	Yes
90832	Psytx w pt 30 minutes	Yes	99355	Prolong e&m/psytx serv o/p	Yes
90833	Psytx w pt w e/m 30 min	Yes	90785	Psytx complex interactive	Yes
90834	Psytx w pt 45 minutes	Yes	G0396	Alcohol/subs interv 15-30mn	Yes
90836	Psytx w pt w e/m 45 min	Yes	G0397	Alcohol/subs interv >30 min	Yes
90837	Psytx w pt 60 minutes	Yes	G0406	Inpt/tele follow up 15	Yes
90838	Psytx w pt w e/m 60 min	Yes	G0407	Inpt/tele follow up 25	Yes
90839	Psytx crisis initial 60 min	Yes	G0408	Inpt/tele follow up 35	Yes
90840	Psytx crisis ea addl 30 min	Yes	G2086	Off base opioid tx 70min	Yes
90845	Psychoanalysis	Yes	G2087	Off base opioid tx, 60 m	Yes
90846	Family psytx w/o pt 50 min	Yes	G2088	Off base opioid tx, add30	Yes