



New and Expanded Flexibilities for Rural Health Clinics (RHCs) and Federally Qualified Health Centers (FQHCs) During the COVID-19 Public Health Emergency (PHE)

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Note: We revised this article to provide additional guidance on telehealth services that have cost-sharing and cost-sharing waived. You'll find substantive content updates in dark red font (see page 5).

PROVIDER TYPES AFFECTED

This MLN Matters® Special Edition Article is for Rural Health Clinics (RHCs) and Federally Qualified Health Centers (FQHCs) during the COVID-19 Public Health Emergency (PHE) for services provided to Medicare beneficiaries.

WHAT YOU NEED TO KNOW

To provide as much support as possible to you and your patients during the COVID-19 PHE, both Congress and we (CMS) have made several changes to the RHC and FQHC requirements and payments. These changes are for the duration of the COVID-19 PHE, and we'll make other discretionary changes as necessary to make sure that your patients have access to the services they need during the pandemic. For more information, please see the RHC/FQHC COVID-19 FAQs at <https://www.cms.gov/files/document/03092020-covid-19-faqs-508.pdf>.

BACKGROUND

New Payment for Telehealth Services

On March 27, 2020, Congress signed into law the Coronavirus Aid, Relief, and Economic Security Act (CARES Act). Section 3704 of the CARES Act authorizes RHCs and FQHCs to furnish distant site telehealth services to Medicare beneficiaries during the COVID-19 PHE. Medicare telehealth services generally require an interactive audio and video telecommunications system that permits real-time communication between the practitioner and the patient. If you have this capability, you can now provide and be paid for telehealth services to Medicare patients for the duration of the COVID-19 PHE.

Any health care practitioner working for you within your scope of practice can furnish distant site telehealth services. Practitioners can furnish distant site telehealth services (approved by Medicare as a distant site telehealth service under the Physician Fee Schedule (PFS)) from any

location, including their home, during the time that they're working for you. A list of these services is available at <https://www.cms.gov/files/zip/covid-19-telehealth-services-phe.zip>.

The statutory language authorizing RHCs and FQHCs as distant site telehealth providers requires that we develop payment rates for these services that are similar to the national average payment rates for comparable telehealth services under the PFS. You must use HCPCS code G2025, the new RHC/FQHC specific G code for distant site telehealth services, to find services furnished via telehealth beginning on January 27, 2020, the date the COVID-19 PHE became effective (see <https://www.phe.gov/emergency/news/healthactions/phe/Pages/2019-nCoV.aspx>).

Note that the changes in eligible originating site locations, including the patient's home during the COVID-19 PHE are effective beginning March 6, 2020.

Your payment for distant site telehealth services is set at \$92.03, which is the average amount for all PFS telehealth services on the telehealth list, weighted by volume for those services reported under the PFS. Because we made these changes in policy on an emergency basis, we need to implement changes to claims processing systems in several stages.

Claims Requirements for RHCs

For telehealth distant site services furnished between January 27, 2020, and June 30, 2020, you must report HCPCS code G2025 on your claims with the CG modifier. You may also append Modifier "95" (Synchronous Telemedicine Service Rendered via Real-Time Interactive Audio and Video Telecommunications System), but it isn't required. We'll pay these claims at the RHC's all-inclusive rate (AIR), and the MAC will automatically reprocess these claims beginning on July 1, 2020, at the \$92.03 rate. You don't need to resubmit these claims for the payment adjustment.

Beginning July 1, 2020, you should no longer put the CG modifier on claims with HCPCS code G2025.

Table 1. RHC Claims for Telehealth Services from January 27, 2020, through June 30, 2020

Revenue Code	HCPCS Code	Modifiers
052X	G2025	CG (required) 95 (optional)

Table 2. RHC Claims for Telehealth Services starting July 1, 2020

Revenue Code	HCPCS Code	Modifiers
052X	G2025	95 (optional)

Claims Requirements for FQHCs

For telehealth distant site services furnished between January 27, 2020, and June 30, 2020 that are also FQHC qualifying visits, you must report 3 HCPCS/CPT codes:

- The FQHC Prospective Payment System (PPS) specific payment code (G0466, G0467, G0468, G0469, or G0470)
- The HCPCS/CPT code that describes the services furnished via telehealth with modifier 95
- G2025 with modifier 95

We'll pay these claims at the FQHC PPS rate until June 30, 2020, and **the MAC will automatically reprocess these claims** beginning on July 1, 2020, at the \$92.03 rate. You don't need to resubmit these claims for the payment adjustment.

When furnishing services via telehealth that aren't FQHC qualifying visits, you should hold these claims until July 1, 2020, and then bill them with HCPCS code G2025. You may append Modifier 95 but it isn't required. (See <https://www.cms.gov/medicare/medicare-fee-for-service-payment/fqhcpps/downloads/fqhc-pps-specific-payment-codes.pdf> for a list of FQHC PPS specific payment codes). Beginning July 1, 2020, you will only need to submit G2025. You may append Modifier 95 but it isn't required.

Table 3. Example of FQHC Claims for Telehealth Services January 27, 2020, through June 30, 2020

Revenue Code	HCPCS Code	Modifiers
052X	G0467 (or other appropriate FQHC Specific Payment Code)	N/A
052X	99214 (or other FQHC PPS Qualifying Payment Code)	95
052X	G2025	95

Table 4. FQHC Claims for Telehealth Services starting July 1, 2020

Revenue Code	HCPCS Code	Modifiers
052X	G2025	95 (optional)

Payment Rate for 2021

Medicare only authorizes payment for distant site telehealth services to RHCs and FQHCs furnished during the COVID-19 PHE. If the COVID-19 PHE is in effect after December 31, 2020, we'll update this rate based on the 2021 PFS average payment rate for these services, weighted by volume for those services reported under the PFS.

Cost Reporting

We won't use costs for furnishing distant site telehealth services to decide the RHC AIR or the FQHC PPS rate, but these costs must be reported on the proper cost report form. RHCs must report both originating and distant site telehealth costs on Form CMS-222-17 on line 79 of the Worksheet A, in the section titled "Cost Other Than RHC Services." FQHCs must report both originating and distant site telehealth costs on Form CMS-224-14, the Federally Qualified Health

Center Cost Report, on line 66 of the Worksheet A, in the section titled “Other FQHC Services”.

Medicare Advantage Wrap-Around

Since telehealth distant site services aren't paid under the RHC AIR or the FQHC PPS, the Medicare Advantage (MA) wrap-around payment doesn't apply to these services. MA plans will adjust wrap-around payment for distant site telehealth services.

Cost-sharing Related to COVID-19 Testing

For services furnished on March 18, 2020, through the duration of the COVID-19 PHE, we'll pay all of the reasonable costs for specified categories of evaluation and management (E/M) services if they result in an order for or administration of a COVID-19 test and relate to the furnishing or administration of such test or to the evaluation of an individual for purposes of deciding the need for such test. This would include applicable telehealth services. (See MLN Matters article [SE20011](#) for more information.) For the specified E/M services related to COVID-19 testing, including when furnished via telehealth, you must waive the collection of co-insurance from beneficiaries. For services in which Medicare waives the coinsurance, you must put the “CS” modifier on the service line. We'll pay **your claims with the “CS” modifier with the coinsurance applied, and the MAC will automatically reprocess these claims beginning on July 1, 2020. Don't collect coinsurance from beneficiaries if the coinsurance is waived.**

Claims Examples:

Table 5. RHC Claims for Telehealth Services from January 27, 2020, through June 30, 2020, when cost sharing is waived:

Revenue Code	HCPCS Code	Modifiers
052X	G2025	CG, CS (required) 95 (optional)

Table 6. RHC Claims for Telehealth Services with cost sharing waived starting July 1, 2020

Revenue Code	HCPCS Code	Modifiers
052X	G2025	CS (required) 95 (optional)

Table 7. FQHC Claims for Telehealth Services January 27, 2020, through June 30, 2020, when cost sharing is waived

Revenue Code	HCPCS Code	Modifiers
052X	G0467 (or other appropriate FQHC Specific Payment Code)	N/A

Revenue Code	HCPCS Code	Modifiers
052X	G0446 (or other FQHC PPS Qualifying Payment Code)	CS, 95 (required)
052X	G2025	CS, 95 (required)

Table 8. FQHC Claims for Telehealth Services starting July 1, 2020, when cost sharing is waived

Revenue Code	HCPCS Code	Modifiers
052X	G2025	CS (required) 95 (optional)

Other Telehealth Flexibilities

During the COVID-19 PHE, you can furnish any Medicare-approved telehealth service under the PFS. (See <https://www.cms.gov/Medicare/Medicare-General-Information/Telehealth/Telehealth-Codes>.) Also, effective March 1, 2020, these services include CPT codes 99441, 99442, and 99443, which are audio-only telephone evaluation and management (E/M) services. You can furnish and bill for these services using HCPCS code G2025. To bill for these services, a physician or Medicare provider who may report E/M services must provide at least 5 minutes of telephone E/M service to an established patient, parent, or guardian. You can't bill for these services if they originate from a related E/M service provided within the previous 7 days or lead to an E/M service or procedure within the next 24 hours or soonest available appointment.

Telehealth Services with Cost-Sharing

For the CPT and HCPCS codes included in the list of telehealth codes at the link above, we'll adjust the coinsurance and payment calculation for distant site telehealth services you furnished to reflect the method used to calculate coinsurance and payment under the PFS. The coinsurance for these services will be 20% of the lesser of the allowed amount (\$92.03) or actual charges, and the payment will be 80% of the lesser of the allowed amount (\$92.03) or the actual charges.

Before the adjustment, the coinsurance for distant site services you furnished was 20% of the actual charges and the payment was the allowed amount (\$92.03) minus the coinsurance.

MACs will automatically reprocess any claims with HCPCS code G2025 for services furnished on or after January 27, 2020 through November 16, 2020 that were paid before we updated the claims processing system to pay HCPCS code G2025 based on the "lesser of" methodology, as described above.

Telehealth Services with Cost-Sharing Waived

The list of telehealth codes at the link above includes several CPT and HCPCS codes that describe preventive services that have waived cost-sharing. As stated earlier in this article, you should bill telehealth services on this list using HCPCS code G2025. To distinguish those telehealth services that don't have cost sharing waived from those that do, such as certain

preventive services you must also report modifier CS. We've modified the descriptor of the CS modifier to account for this additional use as follows:

CS - Cost-sharing waived for specified COVID-19 testing-related services that result in an order for or administration of a COVID-19 test and/or used for cost-sharing waived preventive services furnished via telehealth in Rural Health Clinics and Federally Qualified Health Centers during the COVID-19 public health emergency.

For preventive services furnished via telehealth that have cost-sharing waived, RHCs must report G2025 on claims with the CG and CS modifier and FQHCs must report G2025 with the CS modifier on or after July 1, 2020.

Please see the above-referenced claim examples for Cost-Sharing Related to COVID-19 Testing. These examples will also apply to preventive services that have cost-sharing waived.

Expansion of Virtual Communication Services

Payment for virtual communication services now includes online digital evaluation and management services. Online digital evaluation and management services are non-face-to-face, patient-initiated, digital communications using a secure patient portal. The online digital evaluation and management codes that are billable during the COVID-19 PHE are:

- CPT code 99421 (5-10 minutes over a 7-day period)
- CPT code 99422 (11-20 minutes over a 7-day period)
- CPT code 99423 (21 minutes or more over a 7-day period)

To get payment for the new online digital evaluation and management (CPT codes 99421, 99422, and 99423) or virtual communication services (HCPCS codes G2012 and G2010), you must submit an RHC or FQHC claim with HCPCS code G0071 (Virtual Communication Services) either alone or with other payable services. For claims submitted with HCPCS code G0071 on or after March 1, 2020, and for the duration of the COVID-19 PHE, payment for HCPCS code G0071 is set at the average of the national non-facility PFS payment rates for these 5 codes. We'll pay claims submitted with G0071 on or after March 1, 2020 and for the duration of the COVID-19 PHE at the new rate of \$24.76, instead of the CY 2020 rate of \$13.53. **MACs will automatically reprocess any claims with G0071 for services furnished on or after March 1, 2020 that were paid before we updated the claims processing system.**

Revision of Home Health Agency Shortage Requirement for Visiting Nursing Services

You can bill for visiting nursing services furnished by an RN or LPN to homebound individuals under a written treatment plan in areas with a shortage of home health agencies (HHAs). Effective March 1, 2020 and for the duration of the COVID-19 PHE, we have determined that the area typically served by the RHC, and the area included in the FQHC service area plan have a shortage of HHAs, and this determination doesn't require a request. You must check the HIPAA Eligibility Transaction System (HETS) before providing visiting nurse services to make sure that the patient isn't already under a home health plan of care.

Consent for Care Management and Virtual Communication Services

Medicare requires beneficiary consent for all services, including non-face-to-face services. During the COVID-19 PHE, you may get beneficiary consent at the same time you initially provide the services. This means that someone working under your general supervision can get beneficiary consent. Direct supervision isn't required to get consent. In general, auxiliary personnel under general supervision of the billing practitioner can get beneficiary consent to receive these services. The person getting consent can be an employee, independent contractor, or leased employee of the billing practitioner. (see: <https://www.cms.gov/files/document/covid-final-ifc.pdf>).

Revision of Bed Count Methodology for Determining Provider-Based RHCs Exemption to the RHC Payment Limit

If you're a provider-based to a hospital with fewer than 50 beds, you are exempt from the national per-visit payment limit for RHCs. Due to the COVID-19 PHE, some hospitals have been or are planning to increase inpatient bed capacity to address the increased need for inpatient care. If you're currently exempt from the national per-visit payment, we're working to prevent you from losing your exemption due to the COVID-19 PHE and to encourage hospitals to increase bed capacity if needed. We'll use the number of beds from the cost reporting period prior to the start of the COVID-19 PHE as the official hospital bed count for deciding exemption to the payment limit. If you had a provider-based status and were exempt from the national per-visit payment limit before the effective date of the COVID-19 PHE (January 27, 2020), you will continue to be exempt from the national payment limit for the duration of the PHE for the COVID-19.

Exception to the Productivity Standards for RHCs

We use productivity standards to help decide the average cost per patient for your Medicare reimbursement. Physicians, nurse practitioners, physician assistants, and certified nurse midwives are held to a minimum number of visits per full time employee (FTE) that they're expected to furnish in the RHC. Failure to meet this minimum may show that they're operating at an excessive staffing level, thus, generating excessive cost.

Many RHCs have had to change the way they staff their clinics and bill for RHC services during the COVID-19 public health emergency (PHE). As a result, these RHCs may have difficulty in meeting the productivity standards. To minimize the burden on RHCs, your MAC may grant exceptions to the productivity standard during the COVID-19 PHE. Your MAC will provide further direction.

ADDITIONAL INFORMATION

View the [complete list](#) of coronavirus waivers.

Review information on the current emergencies webpage at <https://www.cms.gov/About-CMS/Agency-Information/Emergency/EPRO/Current-Emergencies/Current-Emergencies-page>.

If you have questions, your MACs may have more information. Find their website at <http://go.cms.gov/MAC-website-list>.

DOCUMENT HISTORY

Date of Change	Description
December 3, 2020	We revised this article to provide additional guidance on telehealth services that have cost-sharing and cost-sharing waived. You'll find substantive content updates in dark red font (see page 5). We also made other language changes for clarity, but these changes did not alter the substance of the article.
July 6, 2020	We revised this article to provide: <ul style="list-style-type: none"> - Additional guidance on telehealth services that have cost-sharing waived and additional claim examples - An additional section on the RHC Productivity Standards All other information remains the same.
April 30, 2020	We revised this article to provide: <ul style="list-style-type: none"> - Additional claims submission and processing instructions - Information on cost-sharing related to COVID-19 testing - Additional information on telehealth flexibilities - Information on provider-based RHCs exemption to the RHC payment limit All other information remains the same.
April 17, 2020	Initial article released.

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