

# 2022 Policy Updates

## What's New and What's Happening in RHCs

Many important changes took effect early this year, including positive developments in updated reimbursement rates and reimbursable services, as well as the implementation of the CMS Vaccine Mandate and Good Faith Estimate rule. NARHC is pleased to break these all down for you here as we continue to advocate on behalf of additional future changes of importance to the RHC community.

### - Telehealth

- The Public Health Emergency (PHE) was extended [again](#) until April 16, 2022, pushing the “telehealth cliff” for all non-mental health via telehealth services and extending the current temporary policy.
  - The payment rates for 2022 are as follows:
    - G2025 (Telehealth Visit): \$97.24
    - G0511 (Care Management): \$79.25
    - G0512 (Psychiatric Collaborative Care Model): \$151.23
    - G0071 (Virtual Care Communications): \$23.88
- The 2022 Medicare Physician Fee Schedule redefined what constitutes a mental health visit to create payment parity between mental health services provided via telehealth and face-to-face encounters, and reimburse accordingly at a RHCs AIR, beginning January 1, 2022.
  - RHCs should bill for these mental health telehealth visits using the 0900 revenue code with *appropriate* HCPCS codes. CMS released the following [guidance](#): “In order to bill for mental health visits furnished via telecommunications for dates of service on or after January 1, 2022, RHCs should bill Revenue code 0900, along with the appropriate HCPCS code for the mental health visit along with modifier CG. Use modifier 95 for services furnished via audio and video telecommunications and use modifier FQ for services that were furnished audio-only.”
  - We will be seeking additional CMS clarification on *appropriate* HCPCS codes.

### - All-Inclusive Rate Payment Limit for CY 2022

- For independent RHCs and provider-based RHCs in a hospital with 50 or more beds, the RHC payment limit per visit for CY 2022 is \$113.00.

### - Payment for Attending Physician Services Furnished by RHCs to Hospice Patients

- RHC clinicians who provide hospice related care (i.e., attending physician services) can get paid for these as traditional RHC encounters beginning January 1, 2022.

### - Concurrent Billing for Chronic Care Management Services (CCM) and Transitional Care Management (TCM) Services

- RHCs can bill for TCM and other care management services provided to the same beneficiary in the same time period, so long as all billing requirements for each code are followed.

### - Vaccine Administration

- RHCs should bill [directly](#) to Medicare Advantage plans for COVID-19 vaccine administration beginning January 1, 2022 – cost-based reimbursement on the cost report will be for traditional Medicare only in 2022.

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### **- Good Faith Estimate**

- Health care providers are required, beginning January 1, 2022, to issue Good Faith Estimates to all uninsured and self-pay patients who request it or schedule an appointment 3+ days in advance.
- NARHC [webinar](#) and [FAQ](#) provides additional details.
- NARHC sent a [letter](#) to CMS and HHS leadership on January 11 explaining RHC concerns regarding implementation burden and requested that CMS waive or rescind the policy until after the Public Health Emergency.

### **- CMS Vaccine Mandate for Health Care Facilities**

- Following an on-again, off-again legal battle of the authority of CMS to enforce a vaccine mandate, the Supreme Court ruled in January 2022 to reinstate the CMS Vaccine Mandate policy in all 50 states.
- RHCs must prepare their COVID-19 Vaccine Mandate policies and procedures immediately, per 42 CFR 491.8(d), and can find a sample P&P [here](#).
- Exact enforcement dates vary by state, surveyors may terminate RHCs that are out of compliance with this mandate policy.

**States with January 28<sup>th</sup> [enforcement](#) start date:** California, Colorado, Connecticut, Delaware, Florida, Hawaii, Illinois, Maine, Maryland, Massachusetts, Michigan, Minnesota, Nevada, New Jersey, New Mexico, New York, North Carolina, Oregon, Pennsylvania, Rhode Island, Tennessee, Vermont, Virginia, Washington, and Wisconsin

**States with February 14<sup>th</sup> [enforcement](#) start date:** Alabama, Alaska, Arizona, Arkansas, Georgia, Idaho, Indiana, Iowa, Kansas, Kentucky, Louisiana, Mississippi, Missouri, Montana, Nebraska, New Hampshire, North Dakota, Ohio, Oklahoma, South Carolina, South Dakota, Utah, West Virginia, and Wyoming

**Enforcement in [Texas](#) will begin on February 20<sup>th</sup>.**

Please contact NARHC with any questions or concerns about these new policies. We look forward to working with each of you to continue growing and strengthening the RHC program throughout 2022.

Sarah Hohman

NARHC

[Sarah.Hohman@narhc.org](mailto:Sarah.Hohman@narhc.org)

