



Telehealth services after the public health emergency

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Sources:

- [Medicare Learning Network: MLN901705 June 2023](#), Centers for Medicare & Medicaid Services.
 - [List of telehealth services](#), Centers for Medicare & Medicaid Services. September 9, 2023.
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Gaining in popularity among all payers, telehealth services were limited for Medicare beneficiaries prior to the COVID-19 public health emergency (PHE). For the safety of the patient and provider, the Centers for Medicare and Medicaid Services (CMS) expanded the use of telehealth during the PHE. With the announcement of the end of the PHE on May 11, 2023, there were many questions regarding the future of telehealth services guidelines by Medicare and commercial payers.

Medicare guidelines

In June 2023, CMS released the Medicare Learning Network (MLN) Fact Sheet MLN901705 regarding telehealth services that incorporates the extended flexibilities of the Consolidated Appropriations Act 2023.

Before the PHE, the patient had to be in a specific originating site with equipment that could meet audio and visual requirements. Through December 31, 2024, Medicare beneficiaries may receive telehealth services from their location and may use personal devices that will meet the audio/visual capability. Through December 31, 2023, use the place-of-service (POS) code that would have been reported for an in-person visit with **modifier 95: synchronous telemedicine service rendered via a real-time interactive audio and video telecommunications system**.

Beginning January 1, 2024, Medicare will require the use of POS **code 02: telehealth provided other than in patient's home**, or **code 10: telehealth provided in patient's home**. POS code 10 is further defined as "a location other than a hospital or other facility where the patient receives care in a private residence." POS 02 is used for sites other than the private residence, including hospital, facilities including care centers, and group homes.

Before the implementation of PHE guidelines, telehealth services that were eligible for reimbursement were limited to only certain types of distant-site practitioners. With the PHE, the Medicare guidelines were revised to allow more practitioners to provide telehealth services in a near or remote location. According to the MLN Fact Sheet, "all providers who are eligible to bill Medicare for professional services" can provide telehealth through December 31, 2024.

For Medicare beneficiaries, telehealth provided using asynchronous technology is reported with **modifier GQ Via asynchronous telecommunications system**.

Medicare claims are submitted to the Medicare administrative contractor (MAC) using the appropriate CPT® or HCPCS codes, modifiers and place of service code.

Medicare requires the use of audiovisual technology for most services. Through December 31, 2024, two-way, audio-only technology may be used for some behavioral or mental telehealth treatment. The CPT codes describing audio-only services that are allowed include 90785, 90791, 90792, 90832, 90833, 90834, 90836, 90837, 90838, 90839, 90840, 90845, 90846, 90847 and 90853. Note that 90875 is a noncovered service. Other related testing and evaluative services may also be reported as audio-only and can be found on the [CMS List of Medicare Telehealth Services](#).

Other payers

The CPT book identifies specific codes as appropriate for telehealth services with a star icon (★) or those appropriate for audio-only services with the speaker icon (🔊). The codes are also found in appendixes P for audiovisual telehealth and T for audio-only telehealth services. The services in the audio-only list are also found in the audiovisual appendix.

Two modifiers are specifically intended to identify the type of telehealth service that is rendered. Modifier 93 is used for audio-only and modifier 95 identifies audiovisual telehealth.

93: Synchronous telemedicine service rendered via telephone or other real-time interactive audio-only telecommunications system

95: Synchronous telemedicine service rendered via a real-time interactive audio and video telecommunications system

The POS codes used by Medicare are also used by other payers, with 02 and 10 specified as appropriate for reporting telehealth services.

Individual payers may have specific guidelines for providing and reporting telehealth services. The specific payer should be queried to ensure that the services are a covered benefit and are appropriately reported.



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