Under the COVID-19 Public Health Emergency, the Center for Medicare and Medicaid Services (CMS) is allowing full Medicare billing for certain telehealth and telephone encounters, effective March 1, 2020. The below is a summary of CMS guidance. Please confirm with your organization’s compliance officer to ensure local adherence.

Billing Telehealth Encounters

When both audio and visual are used, the encounter types listed below can be billed.

Documentation should proceed as normally, with the Place of Service as 02 Telehealth. (Applicable G-codes and modifiers may be included, but are not necessary during this emergency.) Documentation must include patient consent to telehealth visit. Patient must be included in the encounter.

→ Evaluation and Management, Office (CPT codes 99201-99215)
→ Advance Care Planning (CPT codes 99497-99498) – in this case, surrogate/proxy encounter allowable
→ Emergency Department Visits (CPT codes 99281-99285)
→ 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 Patient, All levels (CPT codes 99341-99345; 99347-99350)
→ Initial and Continuing Intensive Care Services (CPT code 99477-99478)
→ Care Planning for Patients with Cognitive Impairment (CPT code 99483)

Billing Telephone Encounters

CMS has recognized that video encounters are not always feasible. Therefore, Medicare will cover certain additional codes – including advance care planning 99497 and 99498 – fully when conducted by telephone (audio only). Telephone evaluation and management (CPT codes 99441-99443) is also covered, but at the telephone encounter rates.

The full list of allowable codes – including a column showing what’s allowable for audio only (column D) – is available here.