

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 following encounter types can be billed.

Documentation should proceed as normally, with the **Place of Service as would otherwise be the case, and adding Modifier 95 to indicate telehealth**.

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- 994780)
- 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](#).

Allowable Telehealth Platforms

CMS is authorizing the use of any platform with audio and visual capabilities, with [HHS is waiving HIPAA enforcement and penalties](#) for encounters during the public health emergency.

Platforms can include:

FaceTime, Skype, Zoom, Doxy, and more. Many families find using what's already in their smartphone easier than downloading new apps.