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](#).