

THE NATIONAL
TELEHEALTH POLICY
RESOURCE CENTER



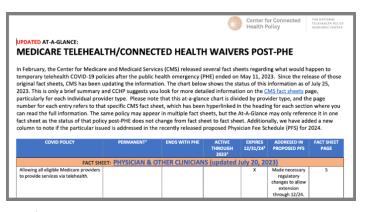
Earlier this year, the <u>Centers for Medicare and Medicaid Services (CMS)</u> released a series of <u>fact sheets</u> with guidance that detailed the status of temporary telehealth COVID-19 policies after the Public Health Emergency (PHE) ended on May 11, 2023. The majority of these fact sheets were released in February but since that time there have been subsequent updates and in some cases changes to what was originally noted in the original versions. CCHP is providing an update to our previously released <u>At-A-Glance chart</u> for this information. Please note that the information in the chart is current through July 25, 2023.

Some changes that should be noted since the initial fact sheets were released include policies regarding frequency limitations and reporting a provider's home address. CMS

had noted that the waiver to telehealth frequency limits for subsequent inpatient and skilled nursing facility (SNF) visits, as well as critical care consult codes, would end with the PHE. However, those policies were reversed in subsequent editions of the fact sheets and frequency limitations waived through 2023. Additionally, these frequency limitations policy waivers were recently proposed to be extended through 2024 in the proposed CY 2024 Physician Fee Schedule (PFS) (also see CCHP's fact sheet and short video on the 2024 PFS proposals).

Another temporary policy that was reversed in subsequent versions of the fact sheets was allowing providers to render services via telehealth from their homes without reporting their home address during enrollment. In the first version of the fact sheets that policy was to end with the PHE. In subsequent versions, it has been extended through the end of 2023. However, unlike the frequency limitations for SNFs, CCHP was unable to find any extension for this policy in the proposed 2024 PFS. As discussed in CCHP's recently released 2023 Medicare Billing Guide, however, providers may be able to work with Credentialing Staff or CMS provider enrollment staff to assist in at least suppressing home addresses when billing.

As noted above, further continuation of some temporary policies has also been addressed in the recently released proposed CY 2024 PFS, but not all policies. In CCHP's At-A-Glance chart we have also added a new column noting which items have



been addressed in the currently proposed PFS.

The telehealth policy landscape is still evolving and as we have noted many times before, a certain policy can be changed without notice. It is important to take note of the dates of when information was released and the version of documents you are referencing, as there could be a more recent one. We at CCHP will do our best to keep you abreast of any new developments.

For more information on these updates, view CCHP's <u>At-A-Glance chart</u>. <u>CCHP's fact</u> <u>sheet on the proposed PFS</u> is also available. The CMS fact sheets can be found on their <u>webpage</u>. CMS also has a general FAQ on <u>COVID-19 Waivers</u>, <u>Flexibilities</u>, <u>and the End of the Public Health Emergency</u> that may be helpful, in addition to the recently updated Medicare Learning Network (MLN) Telehealth Services Fact Sheet.

>> View CMS General FAQs

>> View CMS Post-PHE Fact Sheets

>> View MLN Telehealth Services Fact Sheet

>> View CCHP Proposed CY 2024 PFS Fact Sheet

>> View Updated CCHP At-A-Glance Chart of Post-PHE Policies



CCHP knows that telehealth policy can be a complicated subject and from time to time questions about policies related to your specific situation may arise. You're in luck...We're here for you! Just submit your question via our easy to use contact us form, or send an email to info@cchpca.org

ASK A QUESTION







TO ASK A TELEHEALTH POLICY QUESTION EMAIL US AT: info@cchpca.org

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You are receiving this email because you expressed an interest in learning more about telehealth and the work CCHP is completing.

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