



Coding and Reimbursement during the COVID19 Pandemic

As of May 1, 2020 ****Please use the links to confirm currency of information as changes are being made almost daily****

Topic – Federal Government*	Source
A physician can render telemedicine services from his/her home for Medicare. Provider enrollment does not need to be updated for his/her home address.	https://www.cms.gov/files/document/provider-enrollment-relief-faqs-covid-19.pdf https://www.cms.gov/files/document/summary-covid-19-emergency-declaration-waivers.pdf (page 17) [States]: https://www.fsmb.org/siteassets/advocacy/pdf/state-emergency-declarations-licensures-requirements-covid-19.pdf
Physicians are paid at the non-facility (professional) rate for services that <i>would otherwise be provided</i> face-to-face during the pandemic; using POS 11. Hospitals outpatient clinics can bill originating site fee.	https://www.cms.gov/files/document/covid-final-ifc.pdf (pages 14/15) https://www.cms.gov/files/document/03092020-covid-19-faqs-508.pdf https://www.cms.gov/files/document/covid-medicare-and-medicaid-ifc2.pdf
Telemedicine is defined as “interactive audio and video telecommunications system” and can be rendered by physicians, advanced practice providers and other qualified HCPs.	https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet https://www.cms.gov/files/document/covid-final-ifc.pdf (pages 14/15)
HIPAA privacy regulations are waived.	https://www.phe.gov/emergency/news/healthactions/section1135/Pages/covid19-13March20.aspx https://www.hhs.gov/hipaa/for-professionals/special-topics/hipaa-covid19/index.html
Requirement for physicians to hold a license in the state in which services are rendered is waived.	https://www.phe.gov/emergency/news/healthactions/section1135/Pages/covid19-13March20.aspx
Physicians can render care to <i>new</i> patients via telemedicine, as well as other digital health services.	https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet https://www.cms.gov/newsroom/press-releases/trump-administration-makes-sweeping-regulatory-changes-help-us-healthcare-system-address-covid-19 https://www.cms.gov/files/document/covid-final-ifc.pdf
Physicians <i>can</i> (have the flexibility to) waive all cost-sharing for telemedicine services and other non-face-to-face services.	https://oig.hhs.gov/fraud/docs/alertsandbulletins/2020/telehealth-waiver-faq-2020.pdf https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet
Apple FaceTime, Facebook Messenger video chat, Google Hangouts video and Skype qualify as telemedicine.	Facetime/Skype: https://www.congress.gov/116/plaws/publ123/PLAW-116publ123.pdf Listing of Other Solutions: https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html
Controlled substances can be prescribed via telemedicine.	https://www.deadiversion.usdoj.gov/coronavirus.html
<u>Many</u> services can be rendered via telemedicine; CMS can update at any time.	https://www.cms.gov/Medicare/Medicare-General-Information/Telehealth/Telehealth-Codes
Physicians can proactively place outbound calls to patients.	https://docs.fcc.gov/public/attachments/DA-20-318A1.pdf
Telephones – “audio only” can be used for many telemedicine services; codes 99441–3 paid at E/M rates (99212-4).	https://www.cms.gov/files/document/covid-medicare-and-medicaid-ifc2.pdf https://www.cms.gov/Medicare/Medicare-General-Information/Telehealth/Telehealth-Codes
COVID19 testing-related encounters as of 3/18, modifier CS; MCR pays 100%.	CMS’ MLN Connects Special Edition –April 7, 2020 and April 10, 2020; see also https://www.cms.gov/files/document/FFCRA-Part-42-FAQs.pdf

* Private payers and Medicaid (via 1135 Waivers) are adopting their own policies. See page 2.

This material was provided for the sole purpose of providing insight about current rules and regulations; these rules and regulations are changing daily, and thus, the information is only valid as of the date of the issuance of this memo. It should in no manner be construed as legal advice. Please seek legal counsel.



Quick Links for the Payers' Coding and Reimbursement Policies during the COVID19 Pandemic. Click the Image for Information.

April 11, 2020: CMS Advises Private Payers and ERISA Plans to Cover all COVID19 Tests and E/M Services at which Tests were Ordered at 100% (i.e., no patient cost-sharing); retroactive to March 18, 2020.



BlueCross
BlueShield



Medicaid





Quick Links for More information from the Centers for Medicare & Medicaid Services about Coding & Reimbursement in the COVID19 Pandemic

Telemedicine Fact Sheet

Prescribing Controlled Substances

Phone-Only Paid; April 30 , 2020 Clarifications

Waiver for HIPAA and Provider Licensure

FAQs Addressing Payment, Logistics

Provider Enrollment

Medicare Brochure for Providers

Encourage States/Private Payers

Provider Enrollment from Home

New Patients

March 31, 2020 Clarifications, including POS

Video from CMS – Coding & Billing