

Coding and Documentation Tips: Telehealth

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During the Public Health Emergency (PHE), providers and patients used telehealth services. Now that the PHE has ended (May 11, 2023) Centers for Medicare and Medicaid Services (CMS) has announced some permanent changes and some temporary changes (through December 31, 2024)

Permanent changes:

- Federally Qualified Health Centers (FQHCs) and Rural Health Clinics (RHCs) can serve as a distant site provider for behavioral/mental telehealth services
- Medicare patients can receive telehealth services for behavioral/mental health care in their home
- There are no geographic restrictions for originating site for behavioral/mental telehealth services
- Behavioral/mental telehealth services can be delivered using audio-only communication platforms
- Rural Emergency Hospitals (REHs) are eligible originating sites for telehealth

Temporary Changes:

- FQHCs and RHCs can serve as a distant site provider for non-behavioral/mental telehealth services
- Medicare patients can receive telehealth services in their home
- There are no geographic restrictions for originating site for non-behavioral/mental telehealth services
- Some non-behavioral/mental telehealth services can be delivered using audio-only communication platforms
- An in-person visit within six months of an initial behavioral/mental telehealth service, and annually thereafter, is not required
- Telehealth services can be provided by all eligible Medicare providers
- ***Certain telehealth visits can be delivered audio-only (such as a telephone) if someone is unable to use both audio and video, such as a smartphone or computer.^{1,2}***

The last bullet is important because although CMS is allowing Telehealth visits to be audio only, certain steps must be taken for them to be acceptable.

- Start the visit as audio/video (or at least attempt audio/video)
- Thoroughly document that the visit was audio only.
 - Steps taken to utilize both audio and video
 - Issues that prevented use of both audio and video
 - Technology issues
 - Internet issues
 - Lack of equipment, internet access, etc.

¹ [Telehealth policy changes after the COVID-19 public health emergency | Telehealth.HHS.gov](https://www.hhs.gov/telehealth/policy/changes-after-covid-19-public-health-emergency/)

² The Consolidated Appropriations Act, 2023