

Part B Insider (Multispecialty) Coding Alert

Part B Telehealth Services Are on OIG's Radar

Tip: Update your compliance plan ASAP.

You now have another reason to clean up your telehealth claims issues in 2021. The HHS Office of Inspector General (OIG) added telehealth services used during the COVID-19 public health emergency (PHE) to its audit agenda.

Details: On Jan. 26, OIG announced it would be auditing Part B telehealth services claims in its Work Plan, indicates an Action Item announcement. Due to its importance during the pandemic, the watchdog agency intends to "conduct a series of audits" through a two-phase approach, the OIG brief suggests.



The first audit phase will investigate whether Medicare telehealth requirements were followed for E/M visits, "opioid use order, end-stage renal disease, and psychotherapy" during the COVID-19 PHE, OIG explains. "Phase two audits will include additional audits of Medicare Part B telehealth services related to distant and originating site locations, virtual check-in services, electronic visits, remote patient monitoring, use of telehealth technology, and annual wellness visits to determine whether Medicare requirements are met," the Active Item materials add.

Bottom line: "There are still plenty of options and solutions available to Medicare providers that wish to safeguard themselves against the potential downside of future telehealth audit and oversight activity by the OIG," say attorneys **Matthew Shatzkes** and **John Tilton** with law firm Sheppard, Mullin, Richter & Hampton LLP in online legal analysis. "A robust regulatory compliance program that includes telehealth as an audit priority is one such option," they add.

Resource: See the Work Plan and other recently added Action Items at <https://oig.hhs.gov/reports-and-publications/workplan/active-item-table.asp>.