

## MDS Alert

### Medicare Part B: SNFs 'Rural' Status May Have Changed

**Hint: Medicare says certain conditions must be met for telehealth reimbursement.**

Don't get too excited about the new telehealth option Medicare has publicized for Part B recipients. Though skilled nursing facilities serve as a qualifying point of service (POS) for Medicare telehealth services, there's another important layer SNFs must note. Medicare has some very strict rules about which physician/patient situations qualify for telehealth reimbursement, and you may be surprised.

Medicare determines telehealth eligibility by location of the place of service (POS), and only locations that Medicare determines as rural can qualify.

If your facility has previously qualified as a rural POS and you are interested in utilizing telehealth, make sure your facility has checked to make sure they still hold rural status. Though telehealth sounds like a fantastic option for residents with poor mobility, CMS is trying to get the word out that location matters most.

"Unfortunately, it [telemedicine] doesn't go by the patient's condition," said **Lori Langevin**, provider outreach and education consultant at the Center for Medicare and Medicaid Services' (CMS) **National Government Services** (NGS) in a Jan. 25, 2018, webinar, "Medicare Telehealth Services for Part B Providers."

"We can't stress that enough," she said. "Some of our providers are using telehealth based on patient's physical health, and you really can't do that."

#### Location Matters Most

Medicare will reimburse Part B providers for telehealth services only if the patient presents from a qualifying - and rural - location. Skilled nursing facilities qualify, (POS 31, 32) as long as they're rural.

Other conditions apply, too, said **Gail O'Leary**, provider outreach and education consultant at the CMS NGS, who co-presented the Jan. 25 webinar.

"The service must be on the list of Medicare telehealth services and meet all of the following:

- "Must be furnished via an interactive telecommunications system;
- "Must be furnished by a physician or authorized practitioner;
- "Must be furnished to an eligible telehealth individual;
- "Individual receiving the service must be located in a telehealth originating site."

The Health Resources and Services Administration (HRSA) determines whether the originating site qualifies as rural and reevaluates these sites every year.

**Important:** Verify your address. Many sites that qualified in December 2017 lost their qualifying rural status on Jan. 1.

"The patient has to present from a rural location; the doctor can be anywhere, there is no requirement for the doctors' location," O'Leary said.

**For example:** Medicare Part B will reimburse a physician located in Boston if she has a telemedicine appointment with a Part B recipient who uses a video system to call in from a qualifying, rural site of origin, like a rural skilled nursing facility, as long as the other conditions are met and the documentation has the necessary information.

**Reminder:** "The patient's home is not an approved originating site," O'Leary said multiple times. If the patient's home is the skilled nursing facility, it can qualify as an approved originating site.

Even if the resident is bedbound, a telemedicine encounter qualifies for Part B reimbursement "only if the patient presents at an originating site in a rural location," O'Leary said. "Their condition has no bearing on coverage requirements."

### **Use the Right Equipment**

Your facility will need special equipment to make a telemedicine encounter possible and reimbursable by Medicare. Though the technology in pocket can make connecting over a video call possible, you'll need to use equipment that is advanced enough that there won't be any lag time.

You must use "interactive audio and video telecommunications system that permits real-time communication between the doctor and the beneficiary," **NGS** said. "Asynchronous 'store and forward' technology is not permitted."

Submit this Documentation

The claim for reimbursement should be the same as with any Part B patient encounter, except you need to add the following information, per NGS:

- "A statement that the service was provided using telemedicine;
- "The location of the patient;
- "The location of the provider; and
- "The names of all persons participating in the telemedicine service and their role in the encounter."

**Resource:** Check the eligibility of your facility's address here:

<https://datawarehouse.hrsa.gov/tools/analyzers/geo/Rural.aspx>.