

Health Information Compliance Alert

Take a Look at New Proposed Options for Telehealth in CY 2018

Behavioral health gets a boost with new code proposals promoting telemedicine.

With the rise and necessity of telehealth, CMS pushes forward, adding more coding choices and refining problem areas.

Background: Last year for CY 2017, CMS invested in telehealth with codes for End-Stage Renal Disease (ESRD)-related services for dialysis, advanced care planning, and critical care consultation. Here is an overview of what CMS added for the current year and is available now:

- **CPT® code 90967** (End-stage renal disease [ESRD] related services for dialysis less than a full month of service, per day; for patients younger than 2 years of age).
- **CPT® code 99497** (Advance care planning including the explanation and discussion of advance directives such as standard forms [with completion of such forms, when performed], by the physician or other qualified healthcare professional; first 30 minutes, face-to-face with the patient, family member[s], and/or surrogate).
- **CPT® code +99498** (... each additional 30 minutes [List separately in addition to code for primary procedure]).
- **HCPCS code G0508** (Telehealth consultation, critical care, initial, physicians typically spend 60 minutes communicating with the patient and providers via telehealth).
- **HCPCS code G0509** (Telehealth consultation, critical care, subsequent, physicians typically spend 50 minutes communicating with the patient and providers via telehealth).

CY 2018 proposed updates and revisions: And in last month's Federal Register release of the proposed Medicare Physician Fee Schedule (MPFS) for CY 2018, CMS continued its support of this important care option with a selection of diverse codes supporting behavioral health and chronic care management, as well as a suggestion that it might do away with a particularly frustrating modifier requirement.

Read the proposed MPFS for CY 2018 published on July 21 in the Federal Register:
<https://www.gpo.gov/fdsys/pkg/FR-2017-07-21/pdf/2017-14639.pdf>.

"CMS has again proposed to expand the list of covered telehealth services, including adding coverage for Health Risk Assessments, care planning for chronic care management, and psychotherapy for crisis services provided via telehealth," notes attorney **Benjamin Fee, Esq.** of Dorsey and Whitney LLP in the Des Moines, Iowa office.

Here are the specifics CMS mentioned in the proposed MPFS for CY 2018 fact sheet:

- **HCPCS code G0296** (Visit to determine low dose computed tomography [LDCT] eligibility);
- **CPT® code 90785** (Interactive Complexity);
- **CPT® codes 96160 and 96161** (Health Risk Assessment);
- **HCPCS code G0506** (Care Planning for Chronic Care Management); and
- **CPT® codes 90839 and 90840** (Psychotherapy for Crisis).

Modifier change: The updates also push to drop the need for the "telehealth modifier for professional claims" starting in 2018. "Anytime a billing requirement is removed it is positive, one less regulation to potentially 'trip over,'" says **Vinod Gidwani**, founder and president of Currence Inc. in Skokie, Illinois. "Telemedicine will continue to expand and its potential to bend the cost curve is one of the positive innovations taking place in healthcare."

Note: "The lessening of restrictions, plus the addition of more code options, is an encouraging sign that CMS understands the transformative role of telehealth in healthcare," says **Lee Horner**, president of telehealth at Stratus



Video in Clearwater, Florida. "Telehealth is vital to achieving the triple aim in healthcare □ improving the patient experience of care, improving population health, and reducing the cost of care."

Resource: See the MPFS fact sheet at:

<https://www.cms.gov/Newsroom/MediaReleaseDatabase/Fact-sheets/2017-Fact-Sheet-items/2017-07-13-2.html>.