

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)
Physicians are paid at the facility rate for telemedicine services 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.	Rates: https://www.cms.gov/apps/physician-fee-schedule/overview.aspx Guidance: https://edit.cms.gov/files/document/medicare-telehealth-frequently-asked-questions-faqs-31720.pdf NEW: https://www.cms.gov/files/document/covid-final-ifc.pdf (pages 14/15)
Telemedicine is defined as “interactive audio and video telecommunications system” and can be rendered by physicians, advanced practice providers and other qualified health care professionals.	https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet
HIPAA privacy regulations are waived.	https://www.phe.gov/emergency/news/healthactions/section1135/Pages/covid19-13March20.aspx
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 new 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 NEW: https://www.cms.gov/files/document/covid-final-ifc.pdf
Physicians <i>can</i> 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.	https://www.cms.gov/Medicare/Medicare-General-Information/Telehealth/Telehealth-Codes NEW: https://www.cms.gov/files/document/covid-final-ifc.pdf (starts on page 19)
Physicians can proactively place outbound calls to patients.	https://docs.fcc.gov/public/attachments/DA-20-318A1.pdf
Telephones – “audio only” can be used, but not as telemedicine. See codes 99441–99443, 98966–96968.	https://www.cms.gov/newsroom/press-releases/trump-administration-makes-sweeping-regulatory-changes-help-us-healthcare-system-address-covid-19 NEW: https://www.cms.gov/files/document/covid-final-ifc.pdf (pages 122-125)

* 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 Logo for Information.



BlueCross
BlueShield



Medicaid



**Telemedicine Fact
Sheet**

**Prescribing
Controlled
Substances**

Telephonic Methods

**Waiver for HIPAA
and Provider
Licensure**

**FAQs Addressing
Payment, Logistics**

Provider Enrollment

**Medicare Brochure
for Providers**

**Encourage
States/Private
Payers**

**Provider Enrollment
from Home**

**Audio Only & New
Patients**

**March 31, 2020
Clarifications,
including POS-11**