

## Telehealth Policy and Reimbursement Fact Sheet

Updated September 10, 2024

### Medicaid

1. According to [All Provider Bulletin 374](#) (July 2023), MassHealth will continue reimbursing a broad range of services via telehealth **at parity**, including services provided through live video, audio-only, or asynchronous visits. Because there is no end date, it is a policy that is likely **in perpetuity**.
2. Billing for services provided via Telehealth must include:
  - a. \*Point of Service (POS) code and a modifier; **the claim will be denied without either one listed.**
    - i. POS **10 (patient's home)** or **2 (setting other than patient's home)**
    - ii. Modifiers:
      1. 93: synchronous audio-only telehealth (replaced V3)
      2. 95: synchronous audio-video telehealth
      3. GQ: asynchronous telehealth
      4. FQ: counseling and therapy services using audio-only
3. \*[All Provider Bulletin 379](#) (October 2023) clarified that MassHealth will reimburse providers for telehealth-eligible covered services, which may include codes not listed in Appendix T or P of the CPT codebook.
4. [Transmittal Letter CHC-122](#) (Effective August 2024) announced coverage codes for RPM for patients who meet certain clinical criteria

*\*MassHealth is aware that some CHCs have experienced/ are experiencing issues with T1015 and T1040 claims that have POS 10 and/or modifiers 93 and 95 attached and will provide guidance shortly.*

### Medicare

5. The PHE expired on **May 11, 2023**.
6. The Consolidated Appropriations Act (CAA) of 2023 extended many of the telehealth flexibilities authorized during the PHE through **December 31, 2024**, including:
  - a. [FQHCs can act as distant site providers](#) and bill Medicare for telehealth services.
  - b. Implementation of in-person mental health telehealth requirement: in-person visit within the first 6 months of an initial telehealth visit and every 12 months thereafter (new start date = January 1, 2025).
7. CMS aligned the availability of services on the Physician Fee Schedule CY 2024 with the extension timeframe enacted by CAA of 2023.
  - a. FQHCs may provide **any** services in the [CMS List of Telehealth Services \(2024\)](#).
8. All qualifying telehealth services are billed and reimbursed with FQHC-specific G code, G2025, at CY 2024 rate \$95.29.
9. Mental Health Visit Using Telehealth was made **permanent** for FQHCs after January 1, 2022 for qualifying visits under [FQHC-PPS visit codes](#) G0469 & G0470.
  - a. **Audio-only (modifier FQ)** is allowed when the beneficiary is not capable of or does not consent to **audio-video (modifier 95)** technology.

10. Expansion of Remote Patient Monitoring (RPM) and Remote Therapeutic Monitoring (RTM) services to FQHCs starting January 1, 2024
  - a. RPM services are only for established patients. Patients who had received services during the PHE are considered established patients
  - b. FQHCs can furnish RPM and RTM and bill with general care management code HCPCS G0511
  - c. [CCHP factsheet](#) with details on RPM/RTM visit and billing requirements

#### Commercial Payers

11. Blue Cross Blue Shield is no longer reinstating pre-COVID reimbursement rates for primary care and chronic condition telehealth visits at 80% parity on July 1, 2023. They announced February 17, 2023, they will continue to pay for services at parity indefinitely.
12. Point32Health, the parent organization of Harvard Pilgrim Health Care and Tufts Health Plan, has [resumed reduced reimbursement](#) for primary care and chronic condition telehealth visits at 80% parity effective March 1, 2023.
13. Because telehealth coverage varies by private payer:
  - a. Seek out information from the payer about:
    - i. What CPT and HCPC codes can be delivered via telehealth
    - ii. What modifiers are needed
    - iii. What is the correct POS
    - iv. Which providers are eligible
    - v. If there are any other restrictions
  - b. By [Massachusetts Law](#), behavioral health services delivered via audio-video and audio-only shall be no less than the rate of the payment for the same service delivered in-person

#### Additional Resources

14. [NACHC Telehealth Reimbursement Tip Sheet](#)
15. [NACHC Telehealth Documentation Tip Sheet](#)
16. [NACHC Telehealth E/M Coding Tip Sheet](#)
17. [Medicare Learning Network FQHCs 2024 Guidebook](#)