

POST-PHE TELEHEALTH GUIDANCE



Physicians Caring for Texans

The waivers/services below reference Medicare payment policy only, including Medicare Advantage plans. Other payers, such as Medicaid and commercial health plans, may adopt their own payment rules.

| Services/Waivers | During the PHE | End Date | After the PHE Extension |
|---|--|---------------|--|
| Virtual direct supervision <i>Includes teaching physicians</i> | Virtual presence was added to the definition of direct supervision. | Dec. 31, 2024 | Supervision is allowed through audio and video interactive telecommunication. |
| Audio-only | The Centers for Medicare & Medicaid Services (CMS) allows certain audio-only services. | Dec. 31, 2024 | CMS will continue to allow these services. |
| E-visits | E-visits are allowed for both new and established patients. | Dec. 31, 2023 | E-visits will be allowed for established patients only. |
| Virtual check-in | Virtual check-in is allowed for both new and established patients. | Dec. 31, 2023 | Virtual check-in will be available for established patients only. |
| Place of service (POS) | POS should be coded as if the service had been furnished in person, with modifier 95. | Dec. 31, 2023 | POS should be coded with 02 – other than patient’s home, or 10 – patient’s home. |
| Originating site | Patients in a rural area no longer must receive services at an originating site. | Dec. 31, 2024 | Physicians can continue to see patients regardless of their location. |
| Payment parity | Medicare pays as if the patient were seen in the office. | Dec. 31, 2024 | Payment will be reduced to the facility rate when provided in a place other than the patient’s home (POS 02) Payment will be paid at the non-facility rate when the originating site is the patient’s home (POS 10) |
| Provider types | Physical therapists, audiologists, occupational therapists, and speech pathologists are authorized to provide telehealth services. | Dec. 31, 2024 | These professionals will continue to be able to provide telehealth services. |
| Covid-19 vaccine payment | Medicare pays \$40 per dose. | Dec. 31, 2023 | Payment rate will be set to align with other Part B preventive services. |
| Enrollment | CMS expedites new applications. | May 11, 2023 | Normal application timelines resume. |
| Opt-out enrollment | Physicians are allowed to cancel their opt-out status early. | May 11, 2023 | Physicians will no longer be able to opt out prior to what regulations allow. |
| Telehealth platform | Physicians can use any non-public-facing remote communication platform. | Aug. 9, 2023 | Physicians must use HIPAA-compliant platforms. |
| Prescribing controlled substances | Schedule II-V controlled substances may be prescribed through telemedicine and without a prior in-person visit. | Dec. 31, 2024 | Drug Enforcement Administration will provide guidance via final regulations. |
| Mental Health In-person visit | Not required to establish care | Dec. 31, 2024 | In-person visits will be required within 6 months prior to an initial telehealth treatment and then every 12 months after. |
| Service Address | Enrolled practice location | Dec. 31, 2024 | Must add home address when that address is the distant site location for Medicare telehealth services. |

RESOURCES

[List of Telehealth Services](#) This code list includes temporary services and when they will expire.
[Physicians and Other Clinicians: CMS Flexibilities to Fight COVID](#) (CMS)

[2024 Medicare Physician Fee Schedule final rule](#) (Federal Register)
[Consolidated Appropriations Act of 2023](#) (U.S. Congress)