



CCHP's In-Focus This Week:

CMS Post COVID-19 Policies

CCHP Updates At-A-Glance Chart



AUGUST 1, 2023

Earlier this year, the [Centers for Medicare and Medicaid Services \(CMS\)](#) released a series of [fact sheets](#) with guidance that detailed the status of temporary telehealth COVID-19 policies after the Public Health Emergency (PHE) ended on May 11, 2023. The majority of these fact sheets were released in February but since that time there have been subsequent updates and in some cases changes to what was originally noted in the original versions. CCHP is providing an update to our previously released [At-A-Glance chart](#) for this information. Please note that the information in the chart is current through July 25, 2023.

Some changes that should be noted since the initial fact sheets were released include policies regarding frequency limitations and reporting a provider's home address. CMS

had noted that the waiver to telehealth frequency limits for subsequent inpatient and skilled nursing facility (SNF) visits, as well as critical care consult codes, would end with the PHE. However, those policies were reversed in subsequent editions of the fact sheets and frequency limitations waived through 2023. Additionally, these frequency limitations policy waivers were recently proposed to be extended through 2024 in the proposed [CY 2024 Physician Fee Schedule \(PFS\)](#) (also see CCHP’s [fact sheet](#) and [short video](#) on the 2024 PFS proposals).

Another temporary policy that was reversed in subsequent versions of the fact sheets was allowing providers to render services via telehealth from their homes without reporting their home address during enrollment. In the first version of the fact sheets that policy was to end with the PHE. In subsequent versions, it has been extended through the end of 2023. However, unlike the frequency limitations for SNFs, CCHP was unable to find any extension for this policy in the proposed 2024 PFS. As discussed in CCHP’s recently released [2023 Medicare Billing Guide](#), however, providers may be able to work with Credentialing Staff or CMS provider enrollment staff to assist in at least suppressing home addresses when billing.

As noted above, further continuation of some temporary policies has also been addressed in the recently released proposed CY 2024 PFS, but not all policies. In [CCHP’s At-A-Glance chart](#) we have also added a new column noting which items have been addressed in the currently proposed PFS.

UPDATED AT-A-GLANCE:
MEDICARE TELEHEALTH/CONNECTED HEALTH WAIVERS POST-PHE

In February, the Center for Medicare and Medicaid Services (CMS) released several fact sheets regarding what would happen to temporary telehealth COVID-19 policies after the public health emergency (PHE) ended on May 11, 2023. Since the release of those original fact sheets, CMS has been updating the information. The chart below shows the status of this information as of July 25, 2023. This is only a brief summary and CCHP suggests you look for more detailed information on the [CMS fact sheets](#) page, particularly for each individual provider type. Please note that this at-a-glance chart is divided by provider type, and the page number for each entry refers to that specific CMS fact sheet, which has been hyperlinked in the heading for each section where you can read the full information. The same policy may appear in multiple fact sheets, but the At-A-Glance may only reference it in one fact sheet as the status of that policy post-PHE does not change from fact sheet to fact sheet. Additionally, we have added a new column to note if the particular issued is addressed in the recently released proposed Physician Fee Schedule (PFS) for 2024.

COVID POLICY	PERMANENT ¹	ENDS WITH PHE	ACTIVE THROUGH 2023 ²	EXPIRES 12/31/24 ³	ADDRESSED IN PROPOSED PFS	FACT SHEET PAGE
FACT SHEET: PHYSICIAN & OTHER CLINICIANS (updated July 20, 2023)						
Allowing all eligible Medicare providers to provide services via telehealth.				X	Made necessary regulatory changes to allow extension through 12/24.	5

The telehealth policy landscape is still evolving and as we have noted many times before, a certain policy can be changed without notice. It is important to take note of the dates of when information was released and the version of documents you are referencing, as there could be a more recent one. We at CCHP will do our best to keep you abreast of any new developments.

For more information on these updates, view CCHP's [At-A-Glance chart](#). [CCHP's fact sheet on the proposed PFS](#) is also available. The CMS fact sheets can be found on their [webpage](#). CMS also has a general FAQ on [COVID-19 Waivers, Flexibilities, and the End of the Public Health Emergency](#) that may be helpful, in addition to the recently updated [Medicare Learning Network \(MLN\) Telehealth Services Fact Sheet](#).

[>> View CMS General FAQs](#)

[>> View CMS Post-PHE Fact Sheets](#)

[>> View MLN Telehealth Services Fact Sheet](#)

[>> View CCHP Proposed CY 2024 PFS Fact Sheet](#)

[>> View Updated CCHP At-A-Glance Chart of Post-PHE Policies](#)



CCHP knows that telehealth policy can be a complicated subject and from time to time questions about policies related to your specific situation may arise. You're in luck...We're here for you! Just submit your question via our easy to use [contact us form](#), or send an email to info@cchpca.org

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TO ASK A TELEHEALTH POLICY QUESTION EMAIL US AT: INFO@CCHPCA.ORG

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You are receiving this email because you expressed an interest in learning more about telehealth and the work CCHP is completing.

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