SimiTree

2024 MEDICARE
Telehealth Provisions
For Behavioral Health Providers

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Telehealth plays an integral and growing role in behavioral health practices, with more behavioral health providers than ever billing Medicare. The compliance experts at SimiTree want to help providers make certain their telehealth operations conform to the latest regulations and guidance, including these important Medicare changes for 2024.

These changes include new billing codes for services delivered via telehealth and a host of other new telehealth provisions for behavioral health providers.

Changes were finalized by CMS in the final rule that updates payment policies and Medicare payment rates for CY 2024 for services paid under the Medicare Physician Fee Schedule. The final rule was issued in September 2023, and these changes took effect January 1, 2024.

Who is Affected?

Physicians and behavioral health providers who bill Medicare Administrative Contractors (MACs) for Medicare services paid under the Physicians Fee Schedule.

New CPT and G Codes

New telehealth codes for Medicare telehealth services include three new temporary CPT codes for health and well-being coaching services and one permanent new G code for administering a SDoH assessment. The temporary codes are in place to allow for easier identification and data tracking.

✓ **These new CPT codes are temporary:**

- **0591T** – Health and Well-Being Coaching face-to-face; individual, initial assessment

- **0592T** – Individual, follow-up session, at least 30 minutes

- **0593T** – Group (two or more individuals), at least 30 minutes

✓ **This is a permanent new code:**

- **HCPCS code G0136** – Social Determinants of Health Risk. This code is to be used to bill for the administration of a structured, evidence based SDoH screening tool as part of an Evaluation/Management visit.

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Compliance Tips for G0136

What CMS expects:

1. **Infrequent Use** – This code is not meant to be used frequently. CMS allows it to be used no more often than every six months for a 5-15 minute assessment.

2. **Document Findings** – Any need identified in the assessment should be documented in the medical record. When possible, use Z codes from ICD-10 categories Z55-65 for this purpose.

3. **Follow Up** – When this code is used, CMS will look for appropriate follow-up action on any needs identified. At a minimum, refer the patient to the appropriate resources and take needs into consideration when care planning.

Other New Telehealth Provisions

Beginning in 2024, CMS has also implemented many of the telehealth-related provisions of the Consolidated Appropriations Act (CAA), 2023. Among those which may affect behavioral healthcare providers are:

- ✓ The temporary expansion of the scope of telehealth originating sites for services provided via telehealth to include any site in the U.S. where the patient is at the time of the telehealth service, including a person's home

- ✓ The continued payment for telehealth services rural health clinics (RHCs) and federally qualified health centers (FQHCs) provide using the methodology established for those telehealth services during the public health emergency (PHE)

- ✓ Delaying the requirement for an in-person visit with the physician or practitioner within six months prior to initiating mental health telehealth services, and, again, at subsequent intervals as the Secretary determines appropriate, as well as similar requirements for RHCs and FQHCs

- ✓ The continued coverage and payment of telehealth services included on the Medicare Telehealth Services List (as of March 15, 2020) until December 31, 2024

- ✓ Adding mental health counselors (MHCs) and marriage and family therapists (MFTs) as distant site practitioners for purposes of providing telehealth services

The Non-Facility Payment Rate

Starting in CY 2024, telehealth services provided to people in their homes by providers whose services are reimbursed under the Medicare Physicians Fee Schedule will be paid at the non-facility PFS rate. CMS has clarified that modifier 95 should be used when the clinician is in the hospital and the patient is in the home.

Confused? We Can Help!

Telehealth is a burgeoning area of compliance risk for all healthcare providers, particularly behavioral health providers. The certified healthcare compliance experts at SimiTree can help cut through the confusion, fully explain new and rapidly changing regulations, and make certain your organization is operating an effective and compliant telehealth program.

We'll help your organization:

- Determine how new regulations apply to your organization
- Train key personnel
- Establish fully compliant billing practices
- Improve clinical documentation to mitigate risk
- Meet the most recent, comprehensive compliance guidance issued by the U.S. Office of Inspector General (OIG)

**Reach out to us today at ContactUs@simitreehc.com
to discuss how we can meet your organization's compliance needs.**

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SimiTree

SimiTree provides industry-leading, tech-enabled specialty revenue cycle management (RCM), coding, professional services, data analytics, and talent management resources for post-acute and behavioral health organizations.

Created by the merger of Simione Healthcare Consultants and BlackTree Healthcare Consulting in 2021, SimiTree further expanded its RCM capabilities in 2022 with its Imark Billing acquisition, along with its behavioral health footprint with a strategic alignment with Infinity. In 2023, SimiTree acquired Afia to expand its data analytics capabilities and GreenpointMed to further its RCM abilities.

In addition to clinical, financial, and operational consulting, SimiTree offers a robust suite of outsourced services, including billing, coding, OASIS, Review Choice Demonstration (RCD) and Quality Assessment and Performance Improvement (QAPI), and revenue cycle management; executive placement, interim leadership, retention consulting, and other talent solutions; mergers and acquisitions support; compliance assessments and risk mitigation plans; sales and growth training; and benchmarking and data analytics. For more information, visit www.SimiTreeHC.com.