

Preparing for Change: Federal Telehealth Flexibilities

Telemedicine Key Dates

Future dates below are anticipated

Most state waivers expired.

Assume you need licensure in the state where the patient is at the time of the visit. Monitor compact growth!

Omnibus Bill passes Dec. 23, 2022

January 2023 PHE Waiver Extended

February 2023 White House Notification of PHE End

*Announced PHE End
scheduled for 5.11.23*

May 2023 PHE ends - 151-Day/Omnibus Flexibilities Begin

Possible Impact:

- DEA rules
- Qualifying Providers
- Audio Only Rates

Sept 2023 151-Day Only Flexibilities End and Omnibus takes effect

PFS CY23 rules now apply but Omnibus flexibilities remain in effect - such as payment for audio only, no originating or geographical site restrictions, and no in-person requirement for behavioral health.

Impact: Virtual Supervision

December 2022 CMS releases PFS CY23 Final

Telehealth is still permissible in the home. PHE flexibilities override the PFS CY23 rules regarding telehealth.

Jan. 1, 2023 PFS CY23 Effective

What does this mean?

Home is a covered telehealth patient location for all payors under PHE and under the 151-day/Omnibus extension. Some billing modifiers may change on the back end but nothing up front.

May 2023 HIPAA waiver Ends

All providers must use HIPAA secure, BAA covered video platforms & patient communication tools.

Dec. 31, 2023

Inpatient codes may expire, *Stay tuned!* PFS CY24 goes live tomorrow.

Dec. 31, 2024

Omnibus telehealth flexibilities expire. PFS CY25 goes live tomorrow.

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