

# 2023 Proposed Physician Fee Schedule - Telehealth Policies

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Center for Connected  
Health Policy

THE NATIONAL  
TELEHEALTH POLICY  
RESOURCE CENTER



Mei Wa Kwong, JD,  
*Executive Director, CCHP*

**CENTER FOR CONNECTED HEALTH POLICY (CCHP)**

is a non-profit, non-partisan organization that seeks to advance state and national telehealth policy to promote improvements in health systems and greater health equity.

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# PROPOSED 2023 PFS - TELEHEALTH

- Unpublished version released July 7, 2022; 60 Days to comment after the official version published in Federal Register (7/29/2022)
- Clarified that the eligible COVID-19 eligible telehealth service list will be available in the 151 day grace period
- Acknowledged will abide by the Congressional delay of additional requirements on telemental health and use of audio-only to deliver those services
- Moved additional services into Category 3 – a temporary holding place for some of the COVID-19 eligible telehealth services that will allow them to remain available until 2023



# PROPOSED 2023 PFS - TELEHEALTH

- Adding to the permanent telehealth list codes GXXX1 – GXXX3 which will replace prolonged services codes, specifically 99356 and 99357
- Clarified that they will not be adding telephone E/M codes 99441-99443 to Category 3 but will assign “bundled status” to these codes after the PHE and 151-day grace period
- During the 151-day grace period, modifier “95” should continue to be used but afterwards, use POS 02 or POS 10, whichever is appropriate
- Beginning January 1, 2023, when billing for audio-only, use modifier “93”. Previously CMS had directed FQHCs, RHCs and OTPs to use “FQ” as their modifier for audio-only but are now directing them to use “93” to be consistent

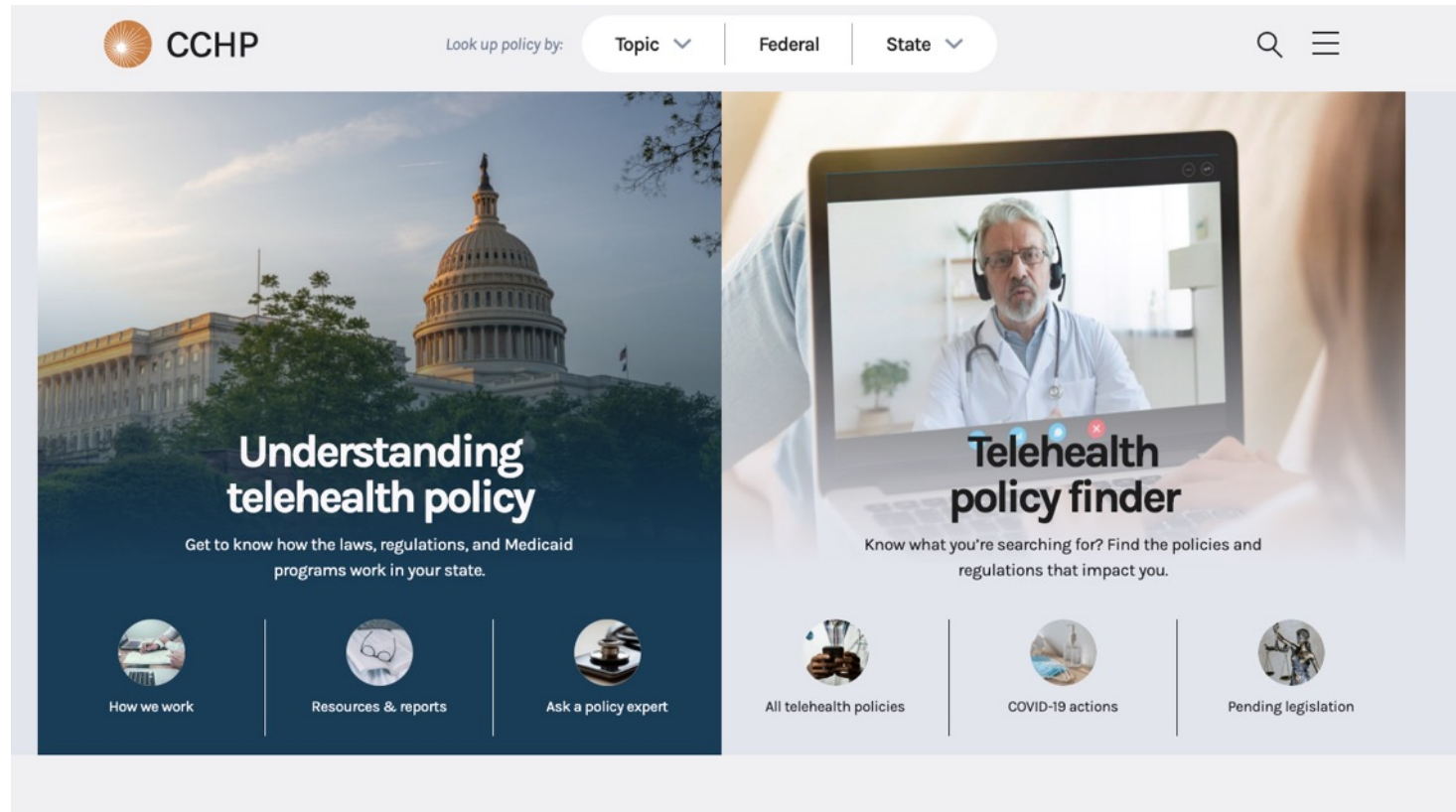


# PROPOSED 2023 PFS - TELEHEALTH

- OTPs will be allowed intake add-on code to be furnished by live video (audio-only if it's not available to the beneficiary) when they bill for initiation of treatment with buprenorphine, to the extent authorized by DEA and SAMHSA
- Telehealth facility fee will be \$28.61 in 2023
- Adding GRTM1-GRTM4, Remote therapeutic monitoring codes
- Pandemic temporary policy on direct supervision via telehealth of diagnostic tests, physicians' services and some hospital outpatient services will not be made permanent and will not be an option during the 151-day grace period
- CCHP Fact Sheet - <https://www.cchpca.org/2022/07/Proposed-2023-Medicare-Physician-Fee-ScheduleFINAL.pdf>



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**Thank You!**

[www.cchpca.org](http://www.cchpca.org)

[info@cchpca.org](mailto:info@cchpca.org)