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POS 02: Telehealth Provided Other than in Patient's Home

<u>Descriptor</u>: The location where health services and health related services are provided or received, through telecommunication technology. Patient is not located in their home when receiving health services or health related services through telecommunication technology.

POS 10: Telehealth Provided in Patient's Home

<u>Descriptor</u>: The location where health services and health related services are provided or received through telecommunication technology. Patient is located in their home (which is a location other than a hospital or other facility where the patient receives care in a private residence) when receiving health services or health related services through telecommunication technology.

CMS recently introduced a new place of service (POS) code for telehealth services and revised the previous POS 02 description to improve the reporting of the telehealth services, as requested by the insurance industry. However, CMS has stated that "we'll continue to recognize the previous POS 02 code as Telehealth" and the local Medicare Administrative Contractor (MAC) for Jurisdiction JJ in Tennessee are to adjudicate claims containing this new code, POS 10 should it appear on a claim the same way they would adjudicate claims with POS 02. Per CMS, any change of policy regarding use of telehealth POS codes following the end of the PHE would be addressed in subsequent instruction.

The POS changes from CMS will be implemented on April 4, 2022 with an original effective date of January 1, 2022. Unlike POS Code 10, the revised POS Code 02 will be affected by the end of the COVID-19 PHE, at which time, it is expected that Medicare will no longer cover telehealth services from a patient's home. For this reason providers must document where the patient was located when the telehealth was performed, as other non-Medicare payers may require the use of the appropriate place of service, as described.

CMS did also clarify that the patient's home includes temporary lodging such as hotels, or homeless shelters, or other temporary lodging that are a short distance from the patient's actual home, where the "originating site facility fee" doesn't apply.

United Healthcare commercial plans adopted the use of POS 10 when telehealth is provided to a patient in their home.

More information can be found on the CMS MLN Matters links below:

MM12549 - CY2022 Telehealth Update Medicare Physician Fee Schedule (cms.gov)

MM12427 - New/Modifications to the Place of Service (POS) Codes for Telehealth (cms.gov)

r11045cp.pdf (cms.gov)

United Healthcare Telehealth Policy:

Telehealth/Virtual Health Policy, Professional - Reimbursement Policy - UnitedHealthcare Commercial Plans (uhcprovider.com)