

Report on Medicare Compliance Volume 28, Number 17. May 06, 2019 CMS Clarifies Place-of-Service Reporting for Telehealth Providers Who Work at Home

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In a new letter, CMS explains how telehealth providers who deliver services from home should report their locations on line 32 of the HCFA 1500 form. This has been a source of confusion since CMS created telehealth place-of-service (POS) code 02, and providers asked for guidance to ensure they comply with billing rules. CMS said providers should put on the claim the address “where they typically practice,” which could mean a facility, but they have to report their home address if that’s where they work 100% of the time.

The confusion surrounds originating sites and distant site practitioners in telehealth, which are core requirements of Medicare coverage. Medicare pays for telehealth services provided at an originating site, which is the location of the beneficiary when the service is furnished through a telecommunications system (although there are some exceptions). Distant site practitioners include physicians, nurses, and clinical psychologists who receive payment for delivering telehealth.

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