

# Report on Medicare Compliance Volume 30, Number 37. October 18, 2021

## New and Revised Telehealth Place-of-Service Codes Change Reporting for Patients at Home

---

By Nina Youngstrom

Paving the way for better reporting of telehealth services provided to patients at home and the permanent coverage of telebehavioral health, CMS has created a new place-of-service (POS) code and revised another, according to Medicare Transmittal 11045, which was posted Oct. 13.<sup>[1]</sup> The codes have implications for telehealth during and after the COVID-19 public health emergency (PHE).

The revised POS code (02) is for telehealth services provided to patients outside their home and the new POS code (10) is for telehealth services provided to patients at home. POS 02 takes effect Jan. 1 and POS 10 on April 4.

POS codes are reported on Form CMS-1500 to communicate the setting where services are provided. Medicare creates and maintains POS codes used by all players in the industry, providers and payers alike (e.g., Original Medicare, Medicare Advantage, commercial payers), as required for HIPAA standardized transaction sets.

“Right now, POS 02 is used for any originating site,” said Richelle Marting, an attorney and certified coder in Olathe, Kansas. “On Jan. 1, and April for Medicare, POS 10 will be used if a patient is at home when receiving telehealth. POS 02 will then only be used for the other eligible originating sites.”

During the PHE, the patient’s home is an originating site for all covered telehealth services, Marting said. That will change when the PHE ends, with limited exceptions, such as substance use disorders and mental health services, and CMS has stepped in with codes for all payers in anticipation of the different directions telehealth is going.

### CMS Creates New Telehealth Code

POS 02 is a long-standing code for telehealth to indicate “the location where health services and health related services are provided or received, through telecommunication technology.” Now CMS has changed the name of the code to “Telehealth Provided Other than in Patient’s Home” and added this language: “Patient is not located in their home when receiving health services or health related services through telecommunication technology.”

“It’s important to distinguish telehealth in the home from not in the home,” said Valerie Rinkle, president of Valorize Consulting. The existing definition of POS 02 only indicated a telehealth service was provided, she noted. “It didn’t identify where the patient was located.” With some exceptions, Medicare didn’t cover telehealth services from a patient’s home until the COVID-19 PHE. In other words, patient homes are not an eligible originating site in normal times, Marting said.

This document is only available to subscribers. Please log in or purchase access.

[Purchase Login](#)

---