

Report on Medicare Compliance Volume 28, Number 2. January 21, 2019 Providers Get Mixed Messages on Telehealth Location, Raising Concern About Originating Sites

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A snag in billing for telehealth services has emerged since CMS created telehealth place of service code 02 (POS 02), and providers are asking CMS what to do about it. Without some formal guidance, they're concerned about compliance with telehealth billing regulations and, depending on what CMS has to say, the privacy of physicians and other practitioners.

The confusion surrounds originating sites and distant site practitioners in telehealth, which are core requirements of Medicare coverage. Medicare only pays for telehealth services provided at an originating site, which is the location of the Medicare beneficiary when the service is furnished through a telecommunications system, according to CMS (although there are some exceptions). Originating sites must be rural areas—a county outside of a statistical area or a health professional shortage area. Distant site practitioners include physicians, nurses, and clinical psychologists who receive payment for delivering telehealth.

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