



# CY 2019 Proposed New Medicare Regulations for RHCs

**NARHC TA WEBINAR**

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MEDICAID SERVICES**





# CY 2019 Physician Fee Schedule (PFS) Proposed Rule

- ▶ The CY 2019 PFS proposed rule (CMS-1693-P) on display at the Federal Register on July 12, 2018, publishes July 27, 2018.
- ▶ <https://www.federalregister.gov/public-inspection/>

# CY 2019 PFS Proposed Rule



- ▶ RHC specific proposals – Section III.C (page 431 in the online version)
- ▶ 60 day comment period; public comments are due no later than 5 p.m. on September 10, 2018



# CY 2019 PFS Proposals for RHCs

1. Revision to Payment for Care Management Services (HCPCS code G0511)
2. New Payment for Communication Technology-Based Services and Remote Evaluations



# 1. Proposed Revision to Payment for Care Management Services (HCPCS code G0511)



# Current Payment Methodology for Care Management Services

RHC payment for HCPCS code G0511 is currently the average of the **3** national non-facility PFS payment rates for:

- ▶ CPT 99490 (20 minutes or more of CCM services)
- ▶ CPT 99487 (60 minutes or more of complex CCM services)
- ▶ CPT 99484 (20 minutes or more of BHI services)

# Proposed Revision to Payment Methodology for Care Management Services

Proposed payment methodology for HCPCS code G0511 would be the average of the **4** national non-facility PFS payment rates for

- ▶ CPT 99490 (20 minutes or more of CCM services)
- ▶ CPT 99487 (60 minutes or more of complex CCM services)
- ▶ CPT 99484 (20 minutes or more of BHI services)
- ▶ CPT 994X7 (30 minutes or more of CCM furnished by a physician or other qualified health care professional)



## **2. Proposed New Payment for Communication Technology- Based Services and Remote Evaluations**

# Proposed New Payment



- ▶ CMS is proposing that, effective January 1, 2019, RHCs receive an additional payment for the costs of communication technology-based services or remote evaluation services that are not already captured in the RHC AIR payment when the requirements for these services are met.

# Proposed Requirements



- ▶ At least 5 minutes of communications-based technology or remote evaluation services
- ▶ Furnished by an RHC practitioner
- ▶ To a patient that has been seen in the RHC within the previous year

# Proposed Requirements



- ▶ May be billed when the medical discussion or remote evaluation is for a condition not related to an RHC service provided within the previous 7 days, and
- ▶ Does not lead to an RHC service within the next 24 hours or at the soonest available appointment (since in those situations the services are already paid as part of the RHC AIR)

# Proposed Billing and Payment

- ▶ New Virtual Communications G code for use by RHCs (and FQHCs) only
- ▶ Payment rate set at the average of the PFS national non-facility payment rates for HCPCS code GVCI1 (communication technology-based services) and HCPCS code GRAS1 (remote evaluation services)

# Proposed Billing and Payment

- ▶ RHC would be able to bill the Virtual Communications G-code either alone or with other payable services
- ▶ The payment rate for the Virtual Communications G-code would be updated annually based on the PFS amounts

# Additional Information



- ▶ Face-to-face billing requirements would be waived
- ▶ Coinsurance and deductibles would apply to RHC claims for these services

# Public Comments



- ▶ Comments due by 5 p.m. on September 10, 2018
- ▶ All comments and questions regarding the proposals are welcome

# Public Comments



Specifically requested comments regarding:

- ▶ the appropriateness of payment for communication technology-based and remote evaluation services in the absence of an RHC visit
- ▶ the burden associated with documentation for billing these codes (RHC practitioner's time, medical records, etc)

# Public Comments

- ▶ Any potential impact on the per diem nature of RHC billing and payment structure as a result of payment for these services
- ▶ Whether it would be clinically appropriate to apply a frequency limitation on the use of the new Virtual Communications G code by the same RHC with the same patient, and on what would be a reasonable frequency limitation to ensure that this code is appropriately utilized

# Public Comments

- ▶ Public comments are due no later than 5 p.m. on September 10, 2018
- ▶ Can be submitted by mail or electronically. (<http://www.regulations.gov>, follow the “Submit a comment” instructions)

# RHC Payment Policy Information

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- ▶ **Fact Sheet, FAQs, Policy Manual**

- ▶ <https://www.cms.gov/Center/Provider-Type/Rural-Health-Clinics-Center.html>