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APG COVID-19 Urgent Alert

April 10, 2020

CMS Announces Applicability of Diagnoses from Telehealth Services for Risk Adjustment

Moments ago, the Centers for Medicare & Medicaid Services (CMS) [announced](#) that organizations, including those in Medicare Advantage (MA), that submit diagnoses for risk adjusted payment are now able to submit diagnoses for risk adjustment that are from telehealth visits. APG has been vigorously advocating for this modification and we applaud CMS for taking this meaningful action.

Submission for these visits are allowed when they meet all criteria for risk adjustment, which include:

- The visit is from an allowable inpatient, outpatient, or professional service, and
- A face-to-face encounter
 - This requirement is met when the services are provided using an interactive audio and video telecommunications system that permits real-time interactive communication

The use of diagnoses from telehealth services applies to submissions to the Risk Adjustment Processing System (RAPS) and those submitted to the Encounter Data System (EDS). For EDS, MA organizations (and other organizations as required)

report all the services they provide to enrollees to the system and CMS will then identify those diagnoses that meet risk adjustment filtering criteria. In order to report services to the EDS that have been provided via telehealth, providers are advised to use place of service code "02" for telehealth or use the CPT telehealth modifier "95" with any place of service.

You can view the CMS announcement by clicking [here](#). Additional questions can be sent to RiskAdjustment@cms.hhs.gov by listing "Applicability of telehealth services for risk adjustment" in the subject line.

We are here to serve as a resource for you. Please don't hesitate to contact me [here](#) with any questions you may have or any situations within your practice that you want me to be aware of.

You can find more resources on our [COVID-19 web page](#). As always, please know that we are in constant contact with federal and agency officials and will share any additional news with you as soon as possible.

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