

ACAAI End of COVID PHE Policy Chart

What Allergists/Immunologists Need to Know

Unless otherwise indicated below, the services/waivers below apply only to Medicare payment policy, including Medicare Advantage. Other payers – commercial and Medicaid – may have their own payment rules.			
Policy	Pre-PHE	PHE Flexibility	Flexibility Status After PHE
Medicare Telehealth: Licensure	In addition to state-specific requirements, Medicare required providers be licensed in the state where they provided services.	Medicare lifted the requirement that providers be licensed in the state where they provided services. Individual state licensure requirements remained, but many states provided flexibilities.	Medicare will defer to state law to determine licensure.
Medicare Remote Patient Monitoring (RPM) Services	Clinicians were required to establish a relationship with a patient prior to providing RPM services.	Clinicians can bill for RPM services for both established and new patients, and for patients with both acute and chronic conditions.	Beginning May 11, 2023, clinicians must have an established relationship with the patient prior to providing RPM services. But RPM services may be provided to patients with both acute and chronic conditions.
Telehealth: HIPAA Compliant Platforms (all payers)	Telehealth services must be HIPAA-compliant.	Waiver of HIPAA penalties for non-compliant telehealth services.	HIPAA penalties for non-compliant telehealth services will resume Aug. 9, 2023 (90-day transition period).
DEA Telehealth Flexibilities (all payers)	In person visits were required to obtain prescriptions for controlled substances.	The ability to prescribe controlled substances based on telehealth patient visits.	Flexibilities extended until Nov. 11, 2023. For any telemedicine relationship that has been established on or before November 11, 2023, flexibilities regarding prescription of controlled medications will continue through November 11, 2024.

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Medicare Virtual Supervision	The physician (or other supervising practitioner) must be present in the office suite when clinical staff prepare allergen and venom extract vials and/or perform diagnostic tests (skin testing).	The physician (or other practitioner) can provide virtual supervision via real-time audio and video technology during allergen extract preparation and skin testing.	Virtual supervision is allowed through Dec. 31, 2023; after that, in-person supervision is required.
Medicare Telehealth: Reimbursement	Telehealth services paid at lower rate.	Telehealth services paid at the higher, non-facility rate.	Extended through Dec. 31, 2023.
Medicare Telehealth: Site restrictions	Geographic and originating site restrictions.	Medicare patients can receive telehealth services in their home, with no geographic restriction for the originating site.	Extended through Dec. 31, 2024.
Medicare Telehealth: Audio-only visits	Real-time visual telehealth component required for similar reimbursement to in-person E/M office visits.	Reimbursement for audio-only visits (99441-99443) is similar to that for in-person E/M office visits.	Extended through Dec. 31, 2024.