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Special Edition CBR #: CBR202108
Impact of the Public Health Emergency (PHE) on
Telehealth
NPI #: 1234567890
Fax #:

Dear Medicare Provider:

The Centers for Medicare & Medicaid Services (CMS) strives to protect the Medicare Trust Fund and effectively manage Medicare resources. To support these goals, CMS has contracted with the RELI Group to develop this Special Edition Comparative Billing Report (CBR) and to support providers with its use.

CMS routinely distributes an educational tool, known as a CBR, to the provider community in a variety of Medicare Fee-for-Service service areas. A CBR reflects a specific provider's billing patterns as compared to his/her peers' patterns for the same services in his/her state or specialty, and nationwide. The CBR is intended to enhance accurate billing practices and support providers' internal compliance activities. The report is not an indication of wrongdoing, and can support internal compliance review efforts, especially those related to coding and billing of code sets. Receiving a CBR is not an indication or precursor to an audit, and it requires no response on a provider's part. Selected providers, however, may be referred for additional review and education as a part of CMS' routine CBR Program.

We hope that this Special Edition CBR can help review your billing practices during the PHE compared to those of your peers.

Please carefully review this report. You may wish to check your records against data in CMS' files and review Medicare guidelines to ensure compliance. Contact your Medicare Administrative Contractor (MAC) with specific billing or coding questions. As appropriate, please share this Special Edition CBR with others who may benefit from and/or assist with reviewing the data provided in the report.

To access an electronic copy of your CBR: [Visit the secure CBR portal](https://cbrfile.cbrpepper.org/) at <https://cbrfile.cbrpepper.org/>. Populate the fields, and in the "validation code" field, enter your unique validation code: [code].

For more information: Please access a recorded webinar and additional resources at CBR.CBRPEPPER.org. For each Special Edition CBR release there will be a webinar to follow.

To request assistance or submit questions: [Contact the CBR Help Desk](https://cbr.cbrpepper.org/Help-Contact-Us) at <https://cbr.cbrpepper.org/Help-Contact-Us>

Sincerely,

The CBR Team

REMINDER: Please ensure your email address and fax number are updated in the following systems:

- [National Plan and Provider Enumeration System](https://nppes.cms.hhs.gov/#/) (NPPES): <https://nppes.cms.hhs.gov/#/>
- [Provider Enrollment, Chain, and Ownership System](https://pecos.cms.hhs.gov/pecos/login.do#headingLv1) (PECOS):
<https://pecos.cms.hhs.gov/pecos/login.do#headingLv1>



Special Edition Comparative Billing Report (CBR) 202108
August 31, 2021

Impact of the Public Health Emergency (PHE) on Telehealth

Introduction

The Centers for Medicare & Medicaid Services (CMS) is committed to providing educational tools related to Medicare policy and billing to the provider community; this CBR supports that effort. This Special Edition CBR focuses on rendering providers that submitted Medicare Part B claims for Current Procedural Terminology® (CPT®) codes 99201 – 99205, 99212 – 99215 with the addition of a Modifier 95 and a Place of Service (POS) 11 (i.e., “Office”). For the purposes of this document and analysis, the term “PHE” refers to the timeframe of Jan. 1, 2020, through Dec. 31, 2020.

The CBR analysis was based on claims extracted from the Integrated Data Repository, based on the latest version of claims available on May 3, 2021. For the trend analysis presented in Figure 1, claims represent dates of service between Jan. 1, 2020, and Dec. 31, 2020.

CMS is dedicated to supporting providers during the PHE with continued educational resources. CMS also acknowledges that claims analyzed within this report may include Dates of Service (DOS) that occurred during the PHE, which significantly impacted providers’ and/or prescribers’ claims and claims data. The CBR is an educational tool aimed at supporting self-audit and internal compliance. As such, please take into account the effect of the PHE on your claims data as you use the CBR in your review processes.

The creation of this CBR takes into account the following guidance provided by CMS about billing for professional telehealth services during the PHE, which was originally printed in the March 31, 2020, release of the [Special Edition MLN Connects®](#) and updated in the April 3, 2020, release of the [Special Edition MLN Connects®](#): “Building on prior action to expand reimbursement for telehealth services to Medicare beneficiaries, CMS will now allow for more than 80 additional services to be furnished via telehealth. When billing professional claims for all telehealth services with dates of services on or after March 1, 2020, and for the duration of the Public Health Emergency (PHE), bill with:

- Place of Service (POS) equal to what it would have been had the service been furnished in-person
- Modifier 95, indicating that the service rendered was actually performed via telehealth.”

You are receiving this CBR because you are in the top 5% of providers by claims volume within the top 25 specialties for the submission of CPT® codes 99201 – 99205, 99212 – 99215 with a Modifier 95 and POS 11 during the PHE.

Coverage and Documentation Overview

Table 1 identifies the CPT® codes used in the CBR analysis.

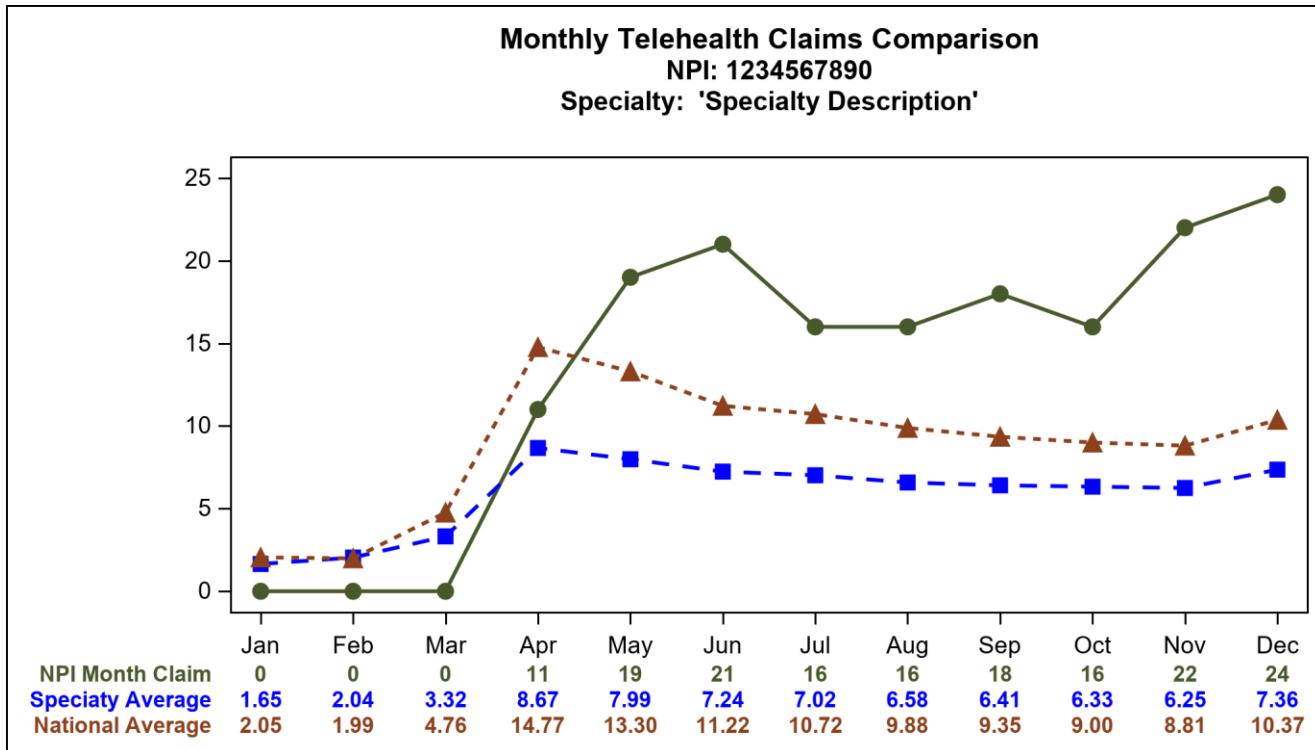
Table 1: CPT® Code Descriptions

CPT® Codes	Description
99201-99205	Office or other outpatient visit for the evaluation and management of a new patient; levels 1-5
99212-99215	Office or other outpatient visit for the evaluation and management of an established patient; levels 2-5

Methods and Results

Each provider's values are compared to the provider's clinical specialty peer group values and the national values. Your metrics were compared to your specialty [Specialty] and the nation.

Figure 1: Average Monthly Telehealth Claims



References and Resources

CPT® 2021 Professional Edition. American Medical Association.

[Special Edition MLN Connects®](#). March 31, 2020. CMS. CMS.gov.

[Special Edition MLN Connects®](#). April 3, 2020. CMS. CMS.gov.