

September 9, 2025

Upcoming Medicare Policy Changes for Telehealth Services

Dear provider,

During the COVID-19 public health emergency, certain allowances were extended for telehealth services by Medicare fee-for-service (FFS) to accommodate Health Plan of San Mateo (HPSM) CareAdvantage members. **Now that the public health emergency is over, the following allowances will expire effective September 30, 2025:**

- Home-based telehealth for non-behavioral, non-mental health services.
- Audio-only telehealth for non-behavioral, non-mental health services.
- Providers who were granted temporary telehealth eligibility, such as physical therapists and occupational therapists, will no longer be eligible to bill for telehealth.

For more information on the telehealth allowances extended by Medicare FFS due to COVID-19, please visit: <https://telehealth.hhs.gov/providers/telehealth-policy/telehealth-policy-updates>

Beginning October 1st, 2025, HPSM will only reimburse for telehealth services under the CareAdvantage line of business that meet the following criteria:

- Services received in certain originating sites [i.e. an office/facility, not the home] in rural areas.
- Monthly End Stage Renal Disease (ESRD) visits for home dialysis.
- Diagnosis, evaluation, or treatment of symptoms of an acute stroke, regardless of location.
- Diagnosis, evaluation, or treatment of mental health/behavioral health disorders, regardless of the location.
- Audio-only services performed in the home if the member declines to share video or does not provide consent to transmit video.

For the full list of CPT codes that are eligible for reimbursement, download:

<https://www.cms.gov/files/zip/list-telehealth-services-calendar-year-2025.zip>

Services must be provided by a "physician" or a "practitioner" as defined in:

- Sec. 1861(r): https://www.ssa.gov/OP_Home/ssact/title18/1861.htm
- Sec. 1842(b)(18)(C): https://www.ssa.gov/OP_Home/ssact/title18/1842.htm

For guidance on frequently asked questions related to telehealth policy:

<https://www.cms.gov/files/document/telehealth-faq-04-09-25.pdf>

Please direct other questions to HPSM Provider Services at PSInquiries@hpsm.org.

Thank you,

The Health Plan of San Mateo