

# POST-PHE TELEHEALTH GUIDANCE



**The waivers/services below reference Medicare payment policy only, including Medicare Advantage plans. Other payers, such as Medicaid and commercial health plans, may adopt their own payment rules.**

Services/Waivers	During the PHE	End Date	After the PHE Extension
Virtual direct supervision <i>Includes teaching physicians</i>	Virtual presence was added to the definition of direct supervision.	Dec. 31, 2025	Supervision is allowed through audio and video interactive telecommunication.
E-visits	E-visits are allowed for both new and established patients.	Dec. 31, 2023	E-visits are allowed for established patients only.
Virtual check-in	Virtual check-in is allowed for both new and established patients.	Dec. 31, 2023	Virtual check-in is allowed for established patients only.
Place of service (POS)	POS should be coded as if the service had been furnished in person, with modifier 95.	Dec. 31, 2023	POS should be coded with 02 – other than patient’s home, or 10 – patient’s home.
Originating site	Patients in a rural area no longer must receive services at an originating site.	Mar. 31, 2025	Physicians can continue to see patients regardless of their location.
Payment parity	Medicare pays as if the patient were seen in the office.	Mar. 31, 2025	Payment will be reduced to the facility rate when provided in a place other than the patient’s home (POS 02) Payment will be paid at the non-facility rate when the originating site is the patient’s home (POS 10)
Provider types	Physical therapists, audiologists, marriage and family therapist, mental health counselors, occupational therapists, and speech pathologists are authorized to provide telehealth services.	Mar. 31, 2025	These provider types will not be able to provide telehealth services. Exception: mental health services
Telehealth platform	Physicians can use any non-public-facing remote communication platform.	Aug. 9, 2023	Physicians must use HIPAA-compliant platforms.
Prescribing controlled substances	Schedule II-V controlled substances may be prescribed through telemedicine and without a prior in-person visit.	Dec. 31, 2025	Drug Enforcement Administration will provide guidance via final regulations.
Mental Health In-person visit	Not required to establish care	Mar. 31, 2025	In-person visits will be required within 6 months prior to an initial telehealth treatment and then every 12 months after.
Service Address	Enrolled practice location	Dec. 31, 2025	Must add home address when that address is the distant site location for Medicare telehealth services.

## RESOURCES

[List of Telehealth Services](#). This code list includes temporary services and when they will expire.

[Calendar Year \(CY\) 2025 Medicare Physician Fee Schedule Final Rule](#)

[2025 Medicare Physician Fee Schedule final rule](#) (Federal Register)