



**ConnectedHealth**



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# Deconstructing Reimbursement for Remote Patient Monitoring

Brian Scarpelli, Connected Health Initiative

Rebecca Gwilt, Nixon Law Group PLLC

Bonnie Britton, Reconnect4Health

# Remote Patient Monitoring

“Using digital technologies to collect medical and other forms of health data from individuals in one location and electronically transmit that information securely to health care providers in a different location for assessment and recommendations.” (CCHP 2018)

- Now: BP cuffs, heart rate monitors, pulse oximeters
- Future: Fitbits, Apple watches, mobile apps

# Background: RPM

- 99091 created in 2002 to describe “Remote Patient Monitoring” or “RPM”
- “Asynchronous” telemedicine
- Work of physician to review RPM output bundled with other management services codes (until now)

# CY2018 Physician Fee Schedule

- Unbundling of 99091
- “Collection and interpretation of physiologic data (e.g., ECG, blood pressure, glucose monitoring) digitally stored and/or transmitted by the patient and/or caregiver to the physician or other qualified health care professional, qualified by education, training, licensure/regulation (when applicable) requiring a minimum of 30 minutes of time.”
- NO geographic restrictions (unlike Medicare telehealth), no originating site requirements

# Key Requirements for 99091

- 30-day period, 30 minutes of time (review, interpret, respond)
- Advance Beneficiary Consent
- Face to Face Visit
- Physician or other Qualified Health Professional
- \$59 (adjusted for geography) billed once per patient per month

# RPM and CCM

- 99091 may be billed during the same service period as chronic care management (CCM) (CPT codes 99487, 99489, and 99490), TCM (CPT codes 99495 and 99496), and behavioral health integration (BHI) (CPT codes 99492, 99493, 99494, and 99484) – but not for the same time as 99091.

# CY2018 Physician Fee Schedule

- CMS acknowledges that its current CPT codes, including 99091, do not reflect the range of connected health innovations and how they can be used in caregiving, deferring to future work within the American Medical Association's (AMA) CPT code development process.
  - i.e., Digital Medicine Payment Advisory Group
- Remaining challenges:
  - Medicare Diabetes Prevention Program (DPP)
  - Medicare Diabetes Self-Management Training (DSME)



# AMA Digital Medicine Payment Advisory Group update

- “Establishment of a clear pathway to clinical integration of digital medicine in order to ensure access to high quality and safe clinical care for patients and their physicians that promote improved health outcomes.”
- Developed code change proposals for the CPT Editorial Panel, which were accepted at its September 2017 meeting:
  - 990X0: Remote monitoring of physiologic parameter(s) (eg, weight, blood pressure, pulse oximetry, respiratory flow rate), initial; set-up and patient education on use of equipment
  - 990X1: device(s) supply with daily recording(s) or programmed alert(s) transmission, each 30 days
  - 994X9: Remote physiologic monitoring treatment management services, 20 minutes or more of clinical staff/physician/other qualified healthcare professional time in a calendar month requiring interactive communication with the patient/caregiver during the month
  - 99090: deleted



# AMA Digital Medicine Payment Advisory Group update

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- Next steps: RUC, possible modifications, CY 2019 PFS

# Quality Payment Program and RPM

- Clinical Practice Improvement Activities (CPIA) Performance Category
  - “Engage Patients and Families (*using PGHD*) to Guide Improvement in the System of Care” is now classified as a "high-weighted" activity
  - “Use of CEHRT to Capture Patient Reported Outcomes” remains from Year 1 as a "medium-weighted" activity
- Advancing Care Information (ACI) Performance Category
  - 10% Bonus for using CEHRT to complete at least one CPIA

# Challenges and Unknowns

- Definition of qualified healthcare professional (who needs to do the monitoring of the data?)
- Definition of physiological data
- Documenting compliance with 99091 requirements (a big technology question)
- Will private payors follow suit?
- 2019 MPFS – July 2018
- Potential liability for clinicians

# Contact

Brian Scarpelli  
Senior Policy Counsel, Connected Health Initiative  
517-507-1446 | [bscarpelli@actonline.org](mailto:bscarpelli@actonline.org)

Rebecca E. Gwilt, Esq.  
Partner, Nixon Law Group  
757.846.4936 | [rebecca.gwilt@nixonlawgroup.com](mailto:rebecca.gwilt@nixonlawgroup.com)

Bonnie P. Britton  
Executive Director, Reconnect4Health  
252-287-6666 | [BBritton@reconnect4health.com](mailto:BBritton@reconnect4health.com)