



## 2024 Billing Updates for Remote Monitoring of Patients

The Centers for Medicare and Medicaid Services (CMS) released the CY 2024 Physician Fee Schedule (PFS) Final Rule in November 2024, which included detailed policy changes related to remote physiologic monitoring (RPM) Medicare reimbursement for tracking physiological patient data. RPM, with codes 99453, 99454, 99457, 99458, and 99091, focuses on monitoring vital signs and preventing health issues. The 2024 billing updates emphasize the significance of these remote care services and provide healthcare providers with new revenue streams.

### Key Changes for 2024

Here is an overview of the fundamental changes in the final rule for Medicare reimbursement under the PFS, effective January 1, 2024. See below for the summarized updates:

1. **Established Patient Requirement:**
  - New patients require prior Evaluation and Management (E/M) services before initiating remote patient monitoring to discuss the care plan.
  - Exceptions: Patients who received RPM services during the Public Health Emergency are exempt from this rule.
2. **16-day Data Collection Requirement:**
  - For CPT codes 99453 and 99454, a minimum of 16 days of data collection is required within a 30-day period (episode of care days).
  - The 16-day rule does not apply to time spent codes 99457 or 99458.
  - The two-day rule during the Public Health Emergency is no longer applicable.
3. **Clarity on RPM "Time Spent":**
  - CMS clarified billing guidelines for time spent codes 99457 and 99458.
  - The 16-day data collection rule does not apply to these codes as time spent is considered treatment management with a billing guideline of a 30-day calendar month.
4. **Only One Provider Can Bill for RPM Codes:**
  - RPM Device CPT codes 99453 and 99454 can be billed by only one practitioner in a 30-day period (episode of care).
5. **RPM Concurrent Billing with Other Services:**
  - RPM cannot be billed concurrently in the same 30-day period as Remote Therapeutic Monitoring (RTM).
  - However, specific services like Chronic Care Management (CCM), Transition Care Management (TCM), Behavioral Health Integration (BHI), Principal Care Management (PCM), and Chronic Pain Management (CPM) can be billed concurrently.
6. **Billing RPM Services During Global Surgery Period:**
  - Providers can bill for RPM services during the global surgery period if the billing provider is not the one receiving the global service payment.
  - CMS will reimburse for RPM services outside of the surgical global period if the patient received these services before the surgical procedure.
7. **FQHCs and RHCs – Care Management CPT Code:**
  - FQHCs and RHCs have new reimbursement opportunities for RPM services using Care Management CPT Code G0511, billable multiple times in a calendar month with a 2024 reimbursement rate of \$71.71.

## RPM Reimbursement Requirements

The reimbursement requirements for Remote Physiologic Monitoring CPT codes in 2024 include the following key points in the table below. In summary, providers can bill for RPM services in 2024 if they adhere to these requirements, ensuring the use of compliant devices, patient consent, proper evaluations, and adherence to specific usage and data collection standards.

Requirement	Description
FDA-Compliant RPM Device	The RPM device used must adhere to the FDA's definition of a medical device
Patient Opt-In	Patients are required to opt-in for the remote patient monitoring service before receiving the RPM device
New Patient Evaluation	A new patient evaluation is necessary for patients who are new to RPM
Continuation for PHE Enrollees	Patients already enrolled in RPM during the Public Health Emergency (PHE) can continue receiving RPM services
Minimum Usage for Billing	To bill for CPT codes 99453 and 99454, patients must use the RPM device for at least 16 days in a 30-day period
HIPAA-Compliant Data Collection	Data collection processes must comply with the Health Insurance Portability and Accountability Act (HIPAA)

## 2024 Reimbursement Rates

There have been changes to the cost fee structure, resulting in slightly lower reimbursement rates for individual CPT Codes for Remote Physiological Monitoring when looking at the average national reimbursement rate for the CPT codes.

### RPM CPT Reimbursement Rates – National Average

RPM CPT Code	2023 Rate	2024 Rate	Change
99453	\$ 19.32	\$ 19.65	\$ 0.33
99454	\$ 50.15	\$ 46.83	\$ (3.32)
99457	\$ 48.80	\$ 48.14	\$ (0.66)
99458	\$ 39.65	\$ 38.64	\$ (1.01)
99091	\$ 54.22	\$ 52.71	\$ (1.51)