2022 Annual Update to the Therapy Code List

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Provider Types Affected

This MLN Matters Article is for physicians, therapists, providers, and suppliers billing Medicare Administrative Contractors (MACs) for therapy services they provide to Medicare patients.

Provider Action Needed

In this Article, you’ll learn about:

- The updated Calendar Year (CY) 2022 therapy code list
- The 5 CPT codes added to the list
- Some of the requirements for using those codes

Make sure your billing staff knows about these updates.

Background

CMS is adding 5 CPT codes and long descriptors as “sometimes therapy” codes effective for dates of service on or after January 1, 2022. The 5 CPT added codes are:

- CPT code 98975 — Remote therapeutic monitoring (e.g., respiratory system status, musculoskeletal system status, therapy adherence, therapy response); initial set-up and patient education on use of equipment

- CPT code 98976 — Remote therapeutic monitoring (e.g., respiratory system status, musculoskeletal system status, therapy adherence, therapy response); device(s) supply with scheduled (e.g., daily) recording(s) and/or programmed alert(s) transmission to monitor respiratory system, each 30 days

- CPT code 98977 — Remote therapeutic monitoring (e.g., respiratory system status, musculoskeletal system status, therapy adherence, therapy response); device(s) supply with scheduled (e.g., daily) recording(s) and/or programmed alert(s) transmission to
monitor musculoskeletal system, each 30 days

- CPT code 98980 — Remote therapeutic monitoring treatment management services, physician/other qualified health care professional time in a calendar month requiring at least one interactive communication with the patient/caregiver during the calendar month; first 20 minutes

- CPT code 98981 — Remote therapeutic monitoring treatment management services, physician/other qualified health care professional time in a calendar month requiring at least one interactive communication with the patient/caregiver during the calendar month; each additional 20 minutes (List separately in addition to code for primary procedure)

We designated these CPT codes as “sometimes therapy” to allow physicians and certain Nonphysician Practitioners (NPPs), including nurse practitioners, physician assistants, and clinical nurse specialists to provide these services outside a therapy plan of care when appropriate. When therapists provide these "sometimes therapy" services, they’re “always therapy.” This means you must use the appropriate therapy modifier – GP, GO or GN -- to reflect that it’s under a physical therapy, occupational therapy, or speech-language pathology plan of care, respectively.

We consider these 5 CPT codes to be remote therapeutic monitoring (RTM) services that physical therapists (PTs), occupational therapists (OTs), and speech-language pathologists can provide, when appropriate. The RTM treatment management services described by CPT codes 98980 and 98981 are provided remotely to patients in their homes by therapists in private practice (TPPs) and facility-based therapists. For example, therapists who work in rehabilitation agencies and comprehensive outpatient rehabilitation facilities would provide these services. You would do the RTM service for the initial set-up and patient education on use of equipment (CPT code 98975) in the office or in the patient’s home.

When physicians, NPPs, or therapists don’t directly perform the services, they must be done under direct supervision. While you must always provide therapists’ services under therapy plans of care, RTM services related to a RTM device that’s specific to therapy services, such as the ARIA Physical Therapy supply device in CPT code 98977 that includes therapeutic exercises, must also be provided under a therapy plan of care when provided by physicians and NPPs. If PTs and OTs delegate the RTM services to physical therapist assistants and occupational therapy assistants, respectively, they’re subject to the de minimis standard (with the exception of the 2 CPT codes for the RTM devices).

More Information

We issued CR 12446 to your MAC as the official instruction for this change.

See the CY 2022 list of codes and the Therapy Services webpage.
For more information, find your MAC’s website.

**Document History**

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<thead>
<tr>
<th>Date of Change</th>
<th>Description</th>
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<tr>
<td>November 12, 2021</td>
<td>Initial article released.</td>
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