

# Understanding Telehealth Enrollment

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## What You Need to Know

During the COVID-19 public health emergency, the Centers for Medicare & Medicaid Services (CMS) allowed providers to deliver telehealth services from home without listing their home address on their Medicare enrollment. **This flexibility is now permanent policy.** Use the telehealth scenarios below to help guide you on how to properly enroll.

## Key Points

- ✓ If you provide telehealth services from your home, but have a physical practice location, you **do not** need to report your home address on your Medicare enrollment application. You can enroll and bill from your physical practice location as if the service was provided in person.
- ✓ If you provide virtual-only telehealth services and your only physical practice location is your home address, you **must** report your home address as a practice location.
- ✓ You are **not required** to enroll in the state(s) where the beneficiary resides.
- ✓ CMS **defers to state law** for telehealth licensure requirements. Ensure you comply with any additional state licensing rules.
- ✓ You may continue to follow the Inter-Jurisdictional Reassignment policy in **Chapter 10, section 10.3.1.4(E) of the [Program Integrity Manual \(PIM\)](#)**. You do not need to convert your existing enrollments to align with this permanent telehealth policy.

## Scenario 1: Private Practice, No Reassignments

**Example:** Dr. Smith has a private practice and provides telehealth from his home in Maryland.

### What to Do

1. Submit your application to the **Maryland MAC** using [PECOS](#) or the paper [CMS-855I \(PDF\)](#).
2. List your home address on the application as your practice location.
3. Select the practice location type as "**Business Office for Administrative/Telehealth Use Only**" or "**Home Office for Administrative/Telehealth Use Only**." This keeps your home address from being published on Care Compare.

### How Are Claims Paid?

The **Maryland MAC** processes claims based on Dr. Smith's practice location in **Maryland**.

## Scenario 2: Reassignment to a Group in the Same State

**Example:** Dr. Smith provides telehealth from his home in Maryland and reassigns to Jones Medical Group, which has a physical practice location in Maryland.

### What to Do

1. Dr. Smith submits an application to the **Maryland MAC** using [PECOS](#) or the paper [CMS-855I \(PDF\)](#) to reassign to Jones Medical Group. No location needs to be listed — all locations are on the group's 855B.
2. Jones Medical Group submits an application to the **Maryland MAC** using [PECOS](#) or the paper [CMS-855B \(PDF\)](#) listing their physical practice location(s). They do not list Dr. Smith's home address.

### How Are Claims Paid?

The **Maryland MAC** processes claims as if Dr. Smith provided the services in person at the group's physical practice location in **Maryland**.

## Scenario 3: Reassignment to a Group in a Different State

**Example:** Dr. Smith provides telehealth from his home in Maryland but reassigns to Jones Medical Group, which is located in Florida and has a physical practice location.

### What to Do

1. Dr. Smith submits an application to the **Florida MAC** using [PECOS](#) or the paper [CMS-855I \(PDF\)](#) to reassign to Jones Medical Group. No location needs to be listed — all locations are on the group's 855B.
2. Dr. Smith indicates on the application (or in a cover letter) that this is a telehealth arrangement. If it's not clear, the MAC will follow up to confirm.
3. Jones Medical Group submits an application to the **Florida MAC** using [PECOS](#) or the paper [CMS-855B \(PDF\)](#) listing their physical practice location(s). They do not list Dr. Smith's home address.

### How Are Claims Paid?

The **Florida MAC** processes claims as if Dr. Smith provided the service in person at the group's physical practice location in **Florida**.

**Licensure Note:** MACs only verify licensure in the state where the provider is physically located. Providers are responsible for ensuring they meet any additional state licensing telehealth requirements on their own.

## Scenario 4: Reassignment to a Virtual/Telehealth-Only Group

**Example:** Dr. Smith provides telehealth from his home in Maryland and reassigns to Jones Medical Group, which operates entirely virtually with no physical practice location.

### What to Do

1. Dr. Smith submits an application to the **Maryland MAC** using [PECOS](#) or the paper [CMS-855I \(PDF\)](#) to reassign to Jones Medical Group. No location needs to be listed — all locations are on the group's 855B.
2. Jones Medical Group submits an application to the **Maryland MAC** using [PECOS](#) or the paper [CMS-855B \(PDF\)](#) and lists Dr. Smith's home address as its practice location (since there is no physical practice location).
4. Jones Medical selects the practice location type as "**Business Office for Administrative/Telehealth Use Only**" or "**Home Office for Administrative/Telehealth Use Only**." This keeps Dr. Smith's home address from being published on Care Compare.

### How Are Claims Paid?

The **Maryland MAC** processes claims based on Dr. Smith's home location in **Maryland**.

## Important Reminders

- **Privacy Protection:** Select the correct practice location type designation on the CMS-855 to prevent your home address from appearing on Care Compare. Update your practice location type via PECOS or the CMS-855 application, if needed.
- **Address Suppression:** Contact [QPP@cms.hhs.gov](mailto:QPP@cms.hhs.gov) to have your home address suppressed while your enrollment application is being processed.
- **Teleradiology:** The policy in this article applies to telehealth. Teleradiology has its own separate policies. Additional CMS guidance is forthcoming regarding teleradiology enrollment.

## Additional Telehealth Resources

- [Telehealth FAQ](#)
- [Telehealth & Remote Monitoring](#)
- [New/Modifications to the Place of Service \(POS\) Codes for Telehealth](#)