

# 2022 CPT® Updates – CDM Focused

## November 30, 2021

### Webinar FAQ Document

- 1. Question** – It appears that CPT®<sup>1</sup> code 98977, *Remote therapeutic monitoring (eg, respiratory system status, musculoskeletal system status, therapy adherence, therapy response); device(s) supply with scheduled (eg, daily) recording(s) and/or programmed alert(s) transmission to monitor musculoskeletal system, each 30 days*, was originally intended for physical therapists. However, we have seen additional information that this code can also be used by occupational therapists and speech-language pathologists. Is that correct?

Answer – The remote therapeutic monitoring procedures must be provided by healthcare professionals in accordance with their state's scope of practice laws and in accordance with the facility's specific bylaws, but the code description does not limit the services to a specific group of providers. If the procedure is appropriately documented and meets the requirements of the CPT® code, these codes may be used by qualified healthcare professionals including physical therapists, occupational therapists, and speech-language pathologists. In the Calendar Year (CY) 2022 Physician Final Rule, the Centers for Medicare & Medicaid Services (CMS) finalized a policy that permits therapists and other qualified healthcare professionals to bill the remote therapeutic monitoring services. They further note that when these services are provided by practitioners whose Medicare benefit does not allow them to bill for services furnished incident to a professional service, the services must be provided directly by the billing practitioner. CMS notes that this group would include physical therapists, occupational therapists, and speech-language pathologists. In the case of a physical or occupational therapist, these services may be provided by a therapy assistant under appropriate supervision.<sup>2</sup>

- 2. Question** – Can you provide information on CPT® code 0692T, *Therapeutic ultrafiltration*, including whether there is a specific device associated to this service?

Answer – CPT® code 0692T describes the therapeutic removal of isotonic plasma water through a semipermeable membrane to restore volume status for patients suffering from fluid overload who are unresponsive to diuretics or other appropriate medical management. As of January 1, 2022, this code may be billed when ultrafiltration is delivered via devices such as the Aquadex SmartFlow® System

- 3. Question** – What areas in a hospital would be expected to use new CPT® codes 98975-98977 for remote therapeutic monitoring services?

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<sup>2</sup> [CY 2022 Payment Policies Under the Physician Fee Schedule and Other Changes to Part B Payment Policies; Medicare Shared Savings Program Requirements; Provider Enrollment Regulation Updates; and Provider and Supplier Prepayment and Post-Payment Medical Review Requirements](https://www.federalregister.gov/documents/2021/11/19/2021-23972/medicare-program-cy-2022-payment-policies-under-the-physician-fee-schedule-and-other-changes-to-part), available at <https://www.federalregister.gov/documents/2021/11/19/2021-23972/medicare-program-cy-2022-payment-policies-under-the-physician-fee-schedule-and-other-changes-to-part> (November 19, 2021)

Answer – The new remote therapeutic monitoring codes, 98975 through 98977, have been designed to allow for future expansion of remote monitoring services as new devices and technologies become available. CMS outlined two different scenarios for the use of these codes in the CY 2022 Physician Proposed and Final Rules. The first scenario involves an asthmatic patient who is prescribed a rescue inhaler equipped with an FDA-approved medical device that monitors patient use of the inhaler, including how many times the patient uses the inhaler, how many doses the patient receives during each use, and the environmental factors existing at the patient's location during use. This information represents non-physiologic data the healthcare professional can use to determine response to therapy in order to inform treatment management. Propellor Health manufactures an FDA-approved sensor that attaches to a patient's inhaler and provides data via a smartphone app.

In the CY 2022 Physician Final Rule, CMS identified the ARIA Physical Therapy device as a product that could be used for remote monitoring of therapy services, when provided under a therapy plan of care. The ARIA Home PT device uses an on-screen coach and remote monitoring to guide patients through their physical therapy program using 3D motion-capture technology to measure movement and capture other metrics vital to the patient's therapy.

4. **Question** – Are the new remote therapeutic monitoring codes specific to musculoskeletal and cardiac services only?

Answer – The codes are designed to be used when an FDA-approved device is used to monitor non-physiologic data related to signs, symptoms, and functions of a therapeutic response. They have been written to allow for future expansion, as new devices meeting this definition achieve FDA approval. At the current time, there are relatively few devices that provide remote monitoring of non-physiologic data that have received FDA approval.

5. **Question** – What is the difference between remote physiologic monitoring and remote therapeutic monitoring?

Answer – Remote physiologic monitoring is the monitoring of physiological parameters such as weight, blood pressure, and pulse oximetry which can be reviewed by the healthcare provider to guide medical decision making. Remote therapeutic monitoring is the review and monitoring of data related to signs, symptoms, and functions of a therapeutic response. Devices used for remote therapeutic monitoring use artificial intelligence (AI) to provide information on therapy adherence and response to treatment which can be used to guide future treatment planning and medical decision making.