



Health and Human Services Extends Public Health Emergency

Effective October 23, 2020, the Public Health Emergency related to COVID-19 has been extended another 90 days. The extension of the Public Health Emergency also extends the related waivers for another 90 days. Find the declaration of the extension [here](#).

Billing for COVID-19 Testing in Skilled Nursing Facility Setting

Skilled Nursing Facilities (SNFs) with a current CLIA Certificate Waiver and that met certain epidemiological criteria were eligible to receive either a Quidel Sofia 2 Instrument or Becton, Dickinson and Company (BD) Veritor™ Plus System along with the associated FDA-authorized antigen diagnostic tests from Health and Human Services. SNFs that received these testing devices are able to keep these devices for future testing, but must procure their own tests directly from the manufacturer or medical device distributor once their initial shipment of tests are used. Find the CMS FAQs regarding SNF testing [here](#).

SNFs cannot bill Medicare for the free diagnostic tests, but can bill for the specimen collection. The Specimen Collection HCPCS code is G2024. This HCPCS is applicable to residents in a non-skilled stay in a SNF and not to those residents in Medicare-covered stays.

SNFs with an active CLIA Waiver can bill Medicare Part B for the diagnostic test kits that they order themselves. To bill for a waived test, SNFs must find the appropriate HCPCS code that matches their test and bill with a QW modifier to indicate it is a waived test. Again, billing is applicable to residents in a non-skilled SNF stay and not to residents in a Medicare-covered stay. Find a complete list of waived tests and HCPCS [here](#).

CMS also updated the Clinical Lab Fee Schedule to include the waived tests and the G2024 specimen collection.

CMS Reverses Previously Deleted NCCI Edits Effective 10/1/20

Effective 10/1/20, CMS has reinstated NCCI edits that had previously been deleted in April 2020. These NCCI edits affect code pairings that result in the need for a -59 modifier in order to bill these therapy codes together and it is imperative that your therapists and billers are aware that these edits are back in place. Examples are 97530 and 97116. [Use this link](#) for the full list of NCCI edits effective 10/1/20. Find the published MLN regarding the update [here](#).

Skilled Nursing Facilities Can Bill Telehealth Originating Site Fee

A telehealth originating site fee is able to be billed by SNFs when a resident is at the facility and the physician is at their home when a telehealth visit is conducted. The facility is using resources and staff time to allow for the telehealth visit and as such, the SNF is able to bill Medicare Part B for this service. The originating site fee is outside of the SNF consolidated billing and is separately billable to Medicare Part B.

The applicable Revenue Code is 078X and HCPCS code is Q3014 with a description stating "telehealth facility fee." The Q3014 may be billed with bill types 22X and 23X and is subject to both the Medicare Part B deductible and coinsurance. More information regarding the Originating Site Facility Payment can be found in the [Medicare Claims Processing Manual, Chapter 12 - Physicians/Nonphysician Practitioners, section 190.5](#).

RKL is acutely aware of the serious strain the COVID-19 emergency has had on skilled nursing providers. Any providers who are experiencing difficulty navigating the ever-changing waivers, experiencing issues with cash flow or have questions regarding the clinical aspect of the COVID-19 emergency are encouraged to contact an RKL Senior Living Partner – [Stefanie Knaub](#), [Stephanie Kessler](#) or [Jeffrey Boland](#) – for assistance.

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RKL LLP 1800 Fruitville Pike
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