

# Place of Service 10 for Telehealth Services Not for Medicare Billing

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March 16, 2022

NGS is receiving calls from providers with regards to the usage of the new POS 10 code.

POS 10 was established and shared from CMS in [‘Change Request 12427 along with MLN Matters MM12427: New/Modifications to the Place of Service \(POS\) Codes for Telehealth.’](#) The instruction issued with this change indicated that: *“Medicare hasn’t identified a need for new POS code 10.”* The directions indicate providers are to continue to use Medicare billing instructions previously established for telehealth. Additionally, this change request comes with an implementation date of 4/4/2022, meaning the code is not accepted by the Medicare Processing System at this time.

During the Public Health Emergency, CMS instructed that special rules for telehealth billing were set up for providers to bill these services with the place of service that would be used if the service was provided in person. Modifier 95 (used to identify the service as telehealth). The purpose of this change, as CMS indicated at the beginning of the PHE, is so payment will not be impacted. If you use POS 02 or POS 10 to identify that the service was provided via telehealth instead of using what was indicated by CMS during the PHE, you will see the telehealth reduction taken on Medicare payments.

This article serves as a reminder that CMS has not identified a need for POS 10 to be used at this point. If CMS governs a need for Medicare determinations, they will issue further instructions. If providers choose to use this place of service for Medicare telehealth services, please note that you will receive a reduction in the allowance for the procedure billed. As previously stated, the implementation date for this change is 4/4/2022, therefore, claims submitted prior to this date with POS 10 will reject as unprocessable, which cannot be changed through the reopening process.