



# Remote Patient Monitoring in a Podiatric Practice

MARCH 11, 2022



# About MHCC

## WHO WE ARE

- ▶ Independent State regulatory agency

## WHAT WE DO

- ▶ Advance innovative value-based care delivery and health information technology statewide by promoting adoption and use, identifying challenges, and raising awareness through outreach activities

## HOW WE HELP

- ▶ Provide timely and accurate information on availability, cost, and quality of health care services to policy makers, purchasers, providers, and the public



# AGENDA

- ▶ Overview of Telehealth
- ▶ Telehealth Resources
- ▶ Podiatric Remote Patient Monitoring
- ▶ Q&A



# Background

- ▶ Telehealth is the delivery of health services using telecommunications and related technologies
- ▶ The MHCC's role in telehealth includes:
  - ▶ Assessing barriers to adoption and proposing solutions to address barriers
  - ▶ Fostering technology adoption and meaningful use
  - ▶ Educating providers and consumers on value and best practices



# Telehealth Modalities

Remote patient monitoring



Live video (synchronous)



Mobile health (mhealth)



Store-and-forward (asynchronous)





# Remote Patient Monitoring (RPM)

- ▶ RPM uses digital technologies to collect health data from a patient in one location (typically the patient's home) and electronically transmit that information securely to a provider in another location
- ▶ Providers can track patients with chronic conditions, share educational materials, and send treatment reminders



# Podiatric RPM Devices



- ▶ Peripheral devices (e.g., digital stethoscope, blood pressure cuff, scale)
- ▶ Implantables (e.g., implantable loop monitoring)
- ▶ Wearables (e.g., specialty socks for diabetic patients, foot orthotics, therapeutic shoes)
- ▶ Mobile health applications installed on smartphones, tablets, or smartwatches

**Sources:**

[podiatrym.com/pdf/2020/10/White1020web.pdf](http://podiatrym.com/pdf/2020/10/White1020web.pdf)  
[www.podiatrym.com/pdf/2019/9/Kesselman919web.pdf](http://www.podiatrym.com/pdf/2019/9/Kesselman919web.pdf)



# RPM Benefits

- ▶ Empowers patients to participate in and better manage their health care by generating their own data
- ▶ Patient-generated data collected outside of a clinical setting provides a more comprehensive view of patient health over time
- ▶ Provides insight into health, activity, diet and exercise, the environment, and social determinants of health
- ▶ Allows providers to track treatment progress and initiate timely interventions





# Telehealth Virtual Resource Center

## For Providers

### THE FUTURE OF WEARABLES IN CARE DELIVERY



More research on the validity and utility of wearables is needed; however, some studies show that wearables help increase patient engagement and give providers more insight into their patients' health and wellness outside of their regularly scheduled visits.<sup>16,17</sup> Use of wearables can be particularly beneficial for patients with chronic conditions (e.g., diabetes, COPD, cardiovascular disease) who need p, and lifestyle

### How RPM Benefits Patients

A wide range of patient data, physiological (e.g., vitals, respiration rate, blood glucose levels) and subjective (e.g., well-being, pain level, satisfaction with health, access to healthy food), can be collected using RPM technology. This data can be used to manage a variety of medical conditions, including diabetes, heart disease, dementia, substance abuse, mental health, and weight gain and loss.<sup>8</sup> Availability and monitoring of physiological and subjective data on a frequent basis provides valuable information about patients' health trends and lifestyles and improves quality of care.<sup>9</sup> Health trends based on RPM data may provide a more accurate and holistic picture of the patient's health, compared to one-time results administered at a provider's office.<sup>10</sup> Access to real-time data also assists in more timely and effective interventions as providers understand what may be abnormal

### Payer Remote Patient Monitoring Policies – A Reference Guide for Ambulatory Practices

#### Overview

Remote patient monitoring (RPM) uses digital technologies to collect health information from a patient and electronically transmit that information securely to a health care provider in a different location.<sup>1</sup> This document overviews coverage and billing for RPM for government and private payers. Coverage policies among private payers differ between fully-insured<sup>2</sup> plans and self-funded plans.<sup>3</sup> All payer policies are subject to change. Providers are encouraged to verify patient eligibility and preauthorization requirements for RPM.

#### About this Reference Guide

Information in the tables that follow can be found on payer websites and online portals.<sup>4</sup> This document is intended for educational purposes; users are encouraged to contact payers for the most up to date information. Items from the Current Procedural Terminology CPT® code set used in this document are copyright of the American Medical Association.<sup>5</sup>

## For Consumers

### What Are Wearables?

Like Dan, more people are using wearable technology to help manage their health and wellness outside of a health care provider's office. Wearables are smart devices<sup>1</sup> that people can wear (usually close to their skin) to track, analyze, and transmit personal data, such as medical, biological, and exercise data. This includes electronic accessories like smartwatches and medical devices, such as pulse oximeters.



Wearables p  
tablets, and  
continuous r  
loss coachin  
that can be p  
related info  
during work  
purposes or  
care team.

### Understanding Consumer Privacy in Virtual Care

*Have you interacted with a health care provider virtually using telecommunications technologies, such as mobile applications, email, text, video, or the web? If you have or are planning to, you might be wondering if it's safe. This flyer explains how the security and confidentiality of your personal health information is protected (as required by federal<sup>1</sup> and State<sup>2</sup> laws) as well as practical steps you can take.*



It's important to recognize the difference between health information and other information shared on the internet. Health information is personal and recorded in an electronic health record or "EHR" (the electronic equivalent of a paper chart).<sup>3</sup> This information is protected by laws like the Health Insurance Portability and Accountability Act (HIPAA) of 1996.<sup>4,5</sup> HIPAA is a federal law consisting of rules to safeguard protected health information or "PHI."<sup>6</sup> Providers must comply with HIPAA to protect PHI whether in paper or electronic form.<sup>7</sup> In general, HIPAA rules require:<sup>8</sup>

- Only people authorized to view or use your health information, like a provider, have access, and only for specific purposes, like diagnosing or treating your health issue; and
- Individually identifiable information be encrypted (i.e., coded so that only someone authorized to receive the information can

[mhcc.maryland.gov/mhcc/Pages/hit/hit\\_telemedicine/hit\\_telemedicine\\_virtual\\_resource.aspx](https://mhcc.maryland.gov/mhcc/Pages/hit/hit_telemedicine/hit_telemedicine_virtual_resource.aspx)



# Podiatric Remote Patient Monitoring



# Utilizing Remote Monitoring to Earn More Money and Improve Patient Outcomes

**MICHAEL L. BRODY DPM**



# Disclosure Slide

- ▶ I am a consultant for Digitsole – a company that manufactures devices that can be used for Remote Therapeutic Monitoring
  - ▶ I will not be discussing the Digitsole device during this presentation
- ▶ I have business interests in TLD Systems, Registry Clearinghouse and CME online none of which have any relationship to this presentation
- ▶ I am a consultant to PICA, Technical Editor for Podiatry Management Magazine, Co-Chair of the EHR workgroup at HL7, none of which have any relationship to this presentation



# Remote Monitoring

- ▶ Remote patient monitoring is a method of healthcare delivery that uses the latest advances in information technology **to gather patient data outside of traditional healthcare settings.**



# How Does this Improve Care

- ▶ When a patient is examined in our office it is not a ‘real world’ environment.
- ▶ The patient is aware they are being examined and this may result in the patient walking differently during the exam
- ▶ With remote patient monitoring we are gathering real world data



# Remote Therapeutic Monitoring vs Remote Physiologic Monitoring

- ▶ These are two totally separate concepts.
- ▶ Remote Therapeutic Monitoring is reimbursable as of January 1, 2022
- ▶ The two monitoring paradigms are for totally different purposes



# Remote Physiologic Monitoring (RPM)

- ▶ For patients with chronic conditions, can include monitoring of:
  - ▶ blood pressure
  - ▶ Weight
  - ▶ Pulse
  - ▶ pulse oximetry
  - ▶ Respirations
  - ▶ respiratory flow rates
  - ▶ Blood sugar
  - ▶ Or any other physiologic value.





# RPM Requirements

- ▶ These data must be collected and transmitted to the provider via one or more medical devices, as defined by the FDA. What's more, remote physiological monitoring is a care coordinated service done in real time throughout the month by a care coordinator in the practice.
  - ▶ these devices must meet the FDA definition of a medical device
  - ▶ monitoring can be by healthcare providers and other qualified healthcare professionals under the general supervision of the billing provider
  - ▶ clinical staff can also perform the set-up and management of the RPM of the patient



# CPT 99453

- ▶ 99453: Initial setup and patient education on use of equipment.
  - ▶ The provider sets up and trains the patient on the use of remote physiologic monitoring equipment.
  - ▶ This code can only be billed once upon initial set-up.
  - ▶ it includes the time spent with the patient or the primary caregiver in giving instructions about the medical device(s)
  - ▶ (CMS) doesn't reimburse for the equipment but just the time involved within the set-up
  - ▶ 99453 is completed only in one patient's life cycle. It can't be billed twice by using the same healthcare provider or National Provider Identifier (NPI) number
  - ▶ This includes the first month – a minimum 16 days of monitoring

*Note: The above services must be ordered by a physician or QHCP, but the service can be carried out by clinical or non-clinical staff.*



# CPT 99454

- ▶ 99454: Device(s) supply with daily recordings or programmed alerts transmission each 30 days.
  - ▶ After the enrollment process of the patient to undergo RPM, the monthly service begins.
  - ▶ report the provision of the medical device(s) for health data and alert transmissions.
  - ▶ This code is valued for the **supply** and programming of the medical device(s).
  - ▶ Basically this means 99454 is the monthly fee for the device
  - ▶ Once again the minimum 16 day rule applies



# These Two Codes are Practice Expense Codes

- ▶ Practice expense–only codes include **no payment for physician time or work but require the presence of a qualified health care provider on premises to bill.**
- ▶ Medically necessary physician evaluations on the same day as PE-only services will typically result in both an E/M service and the procedure being reported



# This Means

- ▶ It is reasonable to bill and E&M code on the day you set the patient up with the device.
- ▶ Since 99454 includes the monthly fee for the device
  - ▶ The device can not be ‘sold’ to the patient
  - ▶ The device can not be ‘given’ to the patient
  - ▶ The device must be owned by the provider and the provider gets a monthly fee for the patient to use the device and send the data to the physician



# Important Details

- ▶ RPM of a patient must consist of at least 16 days' worth of data within 30 days
- ▶ The two practice expense codes can only be billed when at least 16 days of data have been collected on at least one medical device.



# If the Data From the Device

- ▶ Demonstrates that physician intervention and communication from the patient is NOT necessary then there are no additional billable codes.
- ▶ No physician work is necessary



# But

- ▶ If the data from the device results in an interaction with the patient (phone call etc) then additional codes are billable.
- ▶ Because physician work is necessary





# Additional CPT Codes

- ▶ 99457: Remote physiologic monitoring treatment management services (RPMTMS), which includes 20 minutes or more of clinical staff/physician/qualified healthcare professional time in a calendar month requiring interactive communication with the patient/caregiver during the month.
- ▶ 99458 for each additional 20 minutes or more



# Calculating 99457 and 99458

- ▶ 19 minutes of time – NO CODES since it is less than 20 minutes
- ▶ 20 minutes – 39 minutes 99457
- ▶ 40 minutes – 59 minutes 99457 + 99458 (x1)
- ▶ 60 minutes to 79 minutes 99457 + 99458 (x2)
- ▶ Each additional full 20 minutes an additional 99458



# Time is Cumulative

- ▶ If you spend 5 minutes on Monday
- ▶ 3 minutes on Tuesday
- ▶ 8 minutes on Wednesday
- ▶ 10 minutes on Friday
- ▶ That totals 26 minutes for the week
- ▶ Total time over the entire month for calculation when billing 99457 and 99458
- ▶ **MAKE SURE YOU DOCUMENT ALL TIME SPENT** to justify the code you bill.



# You can not double dip on the device bill

- ▶ If you are monitoring multiple physiologic values, you can only bill 99454 once.



But if you are monitoring multiple physiologic values, you can add up the time for treatment management services

- ▶ So if you are monitoring weight, blood pressure, and blood sugar
- ▶ You spend 10 minutes on blood sugar
- ▶ You spend 21 minutes on blood pressure
- ▶ You spend 10 minutes on weight
- ▶ You have spent a total of 41 minutes on remote physiologic monitoring



# How is Remote Therapeutic Monitoring (RTM) Different

- ▶ RPM requires that you monitor a physiologic value. Remote Therapeutic monitoring is monitoring a patients progress for example
  - ▶ Monitoring a patient's gait
  - ▶ Monitoring ulcer healing
  - ▶ Monitoring use of post operative boots
  - ▶ Anything that can be considered monitoring a patients progress in a treatment plan
  - ▶ At this point most therapeutic monitoring solutions are related to musculoskeletal monitoring and respiratory monitoring



# Remote Therapeutic Monitoring

- ▶ **CPT# 98975 : Initial Set-up and Patient Education:**
  - ▶ 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# 98976 : Supply of Device for Monitoring Respiratory System~~
- ▶ **CPT# 98977 : Supply of Device for Monitoring Musculoskeletal System:**
  - ▶ Descriptor: Remote therapeutic monitoring; device(s) supply with scheduled (e.g. daily) recording(s) and/or programmed alert(s) transmission to monitor musculoskeletal system, each 30 days



# Important Note

- ▶ **CPT# 98977 : Supply of Device for Monitoring Musculoskeletal System:**
- ▶ You are supplying the device to the patient – you can not SELL the device to the patient; you can not GIVE the device to the patient. You are either purchasing or leasing the device and the costs to you are built into this code.





# 98975, 98976 and 98977

- ▶ Are PRACTICE EXPENSE ONLY CODES
- ▶ This means they are for the ‘device’ and not for any work by the clinician.
- ▶ So, the same rules regarding the device apply for these codes



- ▶ **CPT# 98980 : Monitoring/Treatment Management Services, first 20 minutes:**
  - ▶ Remote therapeutic monitoring treatment, 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#98981 : Monitoring/Treatment Management Services, each additional 20 minutes:**
  - ▶ Remote therapeutic monitoring treatment, 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



# Can RTM be used for Non-physiological Data?

- ▶ RTM is designed for the management of patients using medical devices that collect non-physiological data. Data around indicators such as therapy/medication adherence, therapy/medication response, and pain level can be collected and billed under the new RTM codes.



# How is this Different from Remote Physiologic Monitoring?

- ▶ Remote Physiologic Monitoring can only be used in conjunction with tracking physiologic data (e.g., foot temperature, heart rate, blood pressure, and blood sugar levels).



# What Kind of Device Can be Used for Remote Therapeutic Monitoring

- ▶ Devices used for RTM must meet the FDA's definition of a medical device



# Devices for Podiatry

- ▶ Monitor Patients Gait
- ▶ Monitor Patients Wounds
- ▶ Monitor Adherence to Post Operative home PT
- ▶ Monitor Adherence to use of off-loading devices



# Clinical Value of Monitoring Gait

- ▶ Patients who are being treated for foot pain will often walk with an altered gait
- ▶ One question that should be asked is:
  - ▶ Is the altered gait a result of the foot pain or is the altered gait the cause of the foot pain?
    - ▶ Musculo skeletal imbalances can cause altered gait that can result in foot pain.
    - ▶ Guarding due to foot pain can cause altered gait
- ▶ Understanding the nature of the altered gait may be of value to help develop treatment plans



# To that End

- ▶ Prior to dispensing a device that monitors gait you should complete a biomechanical evaluation and gait examination in your office to get a baseline.





# Once You Begin Your Treatment Plan

- ▶ You want to see an improvement in gait
  - ▶ Greater symmetry
  - ▶ Increased stride length
  - ▶ Better cadence
- ▶ You want to see improvements over time that demonstrate improved patient function.



# Pain May be Absent

- ▶ If a patient has adjusted their gait pattern to ‘protect’ the area that is painful the patient may not report significant pain but will demonstrate an abnormal gait.
- ▶ How often have you observed something on a patient’s foot and the patient states “that does not bother me”. The patient may have already compensated and modified their gait to avoid pain.



# Monitoring Patient use of Off-loading Devices

- ▶ If a patient is placed in a device such as a Crow Boot or a Cam Walker a remote monitoring solution that monitors the patient's compliance with the off loading device would be considered RTM



# Clinical Value of Monitoring Adherence to Off Loading

- ▶ Knowing that a patient is using an off loading device (or not using it) can help us to understand the healing – or lack of healing of a lower extremity wound
- ▶ It can help inform clinical decision making
- ▶ It can help with patient communication and patient education
- ▶ It can result in improved patient outcomes



# Monitoring Wounds

- ▶ Clinical Therapeutic Monitoring can include the patient sending daily digital images of their wounds to the clinician
- ▶ These images can inform clinical decisions that may result in clinician interventions to improve outcomes



# It is very important – VERY IMPORTANT

- ▶ That services such as Remote Physiologic Monitoring be used appropriately.
- ▶ This is not appropriate with every patient



# When Monitoring Gait

- ▶ Start with the biomechanical examination and gait examination in the office
- ▶ There needs to be a **MEDICAL NECESSITY** to remotely monitor a patient
- ▶ In fact providing services that are not **MEDICALLY NECESSARY** is not ethical, and can be considered Fraud, Waste and Abuse which is a crime.



# When Might Remote Therapeutic Monitoring of Gait be Medically Necessary

- ▶ Pre-Operatively to understand a patient's gait prior to a surgical intervention that may alter their gait
- ▶ Post-Operatively to understand how a surgical procedure has altered a patient's gait
- ▶ Prior to providing Orthotics (custom or OTC) that are intended to improve patient function
- ▶ After providing Orthotics to monitor the patient's progress
- ▶ Any patient with a gait or biomechanical disturbance or gait abnormality prior to instituting therapy and to monitor the effectiveness of the therapy
  - ▶ This includes patients who are at risk of falls and fail the Fall Risk Assessment





# When Remote Monitoring a Wound

- ▶ A wound must be present
- ▶ What about remote monitoring patients at risk of wounds? Is that reasonable?
  - ▶ As long as you document the patient is at high risk of developing a wound and can demonstrate medical necessity it should be reasonable.



# Let's Look at Reimbursement

We will look at both RPM and RTM Services



## 99453 (RPM code)

- ▶ Participating Amount - \$16.72
- ▶ This is a ONE-TIME fee
- ▶ Remember you can bill an E&M code at the time you bill this code



## 99454 (RPM code)

- ▶ Participating Amount - \$48.93
- ▶ This is billable every 30 days and covers the cost a provider incurs if they lease or purchase the device for their patient.
- ▶ You do not need to interact with the patient to receive this payment



## 99457 (RPM code)

- ▶ Participating Amount - \$46.67
- ▶ If as a result of the information you receive from the remote monitoring, you need to interact with the patient for more than 20 minutes, this code is billable. The number of units will vary based upon how much time you interacted with the patient. 1 unit for each 20 minutes.



## 99458 (RPM code)

- ▶ Participating Amount - \$38.46
- ▶ If as a result of the information you receive from the remote monitoring, you need to interact with the patient for more than 20 minutes, this code is billable. The number of units will vary based upon how much time you interacted with the patient. 1 unit for each 20 minutes.



## 98975 (RTM code)

- ▶ Participating Amount - \$17.08
- ▶ This is a ONE-TIME fee
- ▶ Remember you can bill an E&M code at the time you bill this code



## 98976 (RTM code)

- ▶ This code is only for respiratory monitoring





## 98977 (RTM code)

- ▶ Participating Amount - \$48.93
- ▶ This is billable every 30 days and covers the cost a provider incurs if they lease or purchase the device for their patient.
- ▶ You do not need to interact with the patient to receive this payment



## 98980 (RTM code)

- ▶ Participating Amount - \$46.71
- ▶ If as a result of the information you receive from the remote monitoring, you need to interact with the patient this code is billable. This is for the first 20 minutes



## 98981 (RTM code)

- ▶ Participating Amount - \$38.47
- ▶ If as a result of the information you receive from the remote monitoring, you need to interact with the patient for more than 20 minutes, this code is billable. The number of units will vary based upon how much time you interacted with the patient. 1 unit for each 20 minutes.



# Some Important Details

- ▶ You can bill a patient for both RTM and RPM.
- ▶ You can only bill the monthly Physician Only Expense Code for one RTM device and one RPM device no matter how many devices you may have set the patients up with
- ▶ There is no limit on the number of minutes you can spend interacting with a patient related to RTM or RPM
  - ▶ Make sure your documentation supports the time you are billing for.



# What Does this Mean to Your Practice (RTM)

- ▶ With Remote Therapeutic Monitoring you can have additional tools to monitor the outcomes of your treatment and adjust treatment plans to achieve the best possible outcomes.
- ▶ With Remote Therapeutic Monitoring you can be reimbursed for your time and effort to monitor your patients.



# What Does this Mean to Your Practice (RPM)

- ▶ With Remote Physiologic Monitoring you can have additional tools to monitor your patients physiologic values and adjust treatment plans to achieve the best possible outcomes.
- ▶ With Remote Physiologic Monitoring you can be reimbursed for your time and effort to monitor your patients.



# How Many of Your Patients

- ▶ Are Pre Op?
- ▶ Are Post Op?
- ▶ Are using custom or OTC Orthotics?
- ▶ Have a biomechanical or gait disturbance?
- ▶ Are at risk of falls?
- ▶ Multiple that by \$50 and that is your potential monthly additional income for Remote Therapeutic Monitoring.



# How Many of Your Patients

- ▶ Have been told to lose weight to help with their Podiatric Pathology?
- ▶ Have other physiologic values that are valid to measure associated with their Podiatric Pathology?
- ▶ Multiple that by \$49 and that is your potential monthly additional income for Remote Therapeutic Monitoring.





# For Podiatry

- ▶ Remote Therapeutic Monitoring fits better into most practice patterns and can result in improved outcomes for many of our patients.



# But Please Remember

- ▶ When a patient has achieved their anticipated outcome (healed, gait returned to normal etc.) it may no longer be medically necessary to monitor the patient.

QUESTIONS?

