

COVID Telehealth Payment Policies – Comparison Between Medicare FFS and Other Payorsⁱ

Payor	Payor COVID Payment Policy Website	Payment Parity Between Audio Visual and In Person Visits	Payment Parity Between Audio Only Phone Calls and In Person Visits	CPT® Codes ⁱⁱ Used to Report Audio Only Visits	Telehealth for New and Established Patient	Place of Service to Report Telehealth Service Provided	Modifier 95 Required	Expansion of Telehealth List	Telehealth List Used	Cost Sharing Waived for COVID Testing	Cost Sharing Waived for COVID Treatment
Medicare FFS	CMS COVID	Yes Until 12/31/23	Yes Until 12/31/23	99441-99443 Until 12/31/23	Yes Until 12/31/23	Typical POS Until 12/31/24	Yes Until 12/31/24	Yes	CMS List	Yes for Lab tests (No for OTC tests)	No Ended 5/11/23
Aetna Commercial	Aetna COVID (to update Q4 2023)	Yes	Yes	99441-99443	Yes	Typical POS or 02	Yes	Yes	Own List	No Ended 5/12/23	No Ended 2/28/21
Anthem BCBS Commercial	Anthem BCBS	Varies per state	Varies per state	Varies per state		02	Yes	Yes		No Ended 5/12/23 (may vary per plan and state)	No Ended 1/31/21
Anthem BCBS Medicare Advantage	Anthem BCBS Medicare Advantage			99441-99443						No Ended 5/12/23 (may vary per plan and state)	No Ended 1/31/21
BCBS Michigan	BCBSM COVID	Yes	Yes	99441-99443	Yes	02 or 10	Yes	Yes	CMS List	No Ended 5/11/23	No Ended 9/30/21
BCBS Minnesota	BCBSMN COVID	Yes	Yes Until 7/1/23	99441-99443	Yes	Typical POS or 02	Yes If reporting typical POS	Yes	Own List	No Ended 5/11/23	No Ended 12/31/21
BCBS Nebraska*		Yes	Yes		Yes	02	Yes	Yes	Own List	Yes	Yes
BCBS North Carolina	BC-NC	No	No	Use modifier 93	Yes	02 or 10	No	Yes	Own List	No Ended 5/11/23	No Ended 3/31/21

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BCBS North Dakota	BCBS ND	No	No	99441-99443	Yes	02 or 10	Yes (except for specific Online E-Visits and Virtual Check-In Codes)	Yes	Own List	Yes Until 7/31/23	No Ended 3/31/21
Blue Shield California Commercial	Blue Shield CA			99441-99443	Yes	02	Yes	Yes		Yes	No Ended 2/28/21
Capital Blue Cross*		Yes	Yes	99441-99443	Yes	-	Yes	Yes	CMS+	Yes	Yes
CareFirst BCBS Commercial	CareFirst BCBS		Yes (MD) \$20 flat rate regardless of time (DC& VA)	99211-99215 (MD) 99441-99443, 98966-98968 (DC & VA)	Yes	02	Yes	Yes	Own list	No Ended 5/11/23	No Ended 9/1/21
Centene Commercial	Centene Ambetter Health							Yes	Own List	Yes Until 8/1/23	
Cigna Commercial	Cigna COVID	Yes	Yes	99441-99443	Yes	02	Yes	Yes	Own List	No Ended 5/11/23	No Ended 2/15/21

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Excellus Blue Cross ****	Excellus BC	Yes	Yes	99441-99443 99201-99215	Yes	Typical POS (but varies by code)	Yes For services in CPT Appendix P	Yes	CMS+	No Ended 5/11/23	No Ended 1/1/22 (except some self-funded groups)
Florida Blue BCBS Commercial	Florida Blue	Yes	No Ended 6/26/21	99441-99443 Ended 6/26/21	Yes	02	Yes	Yes	CMS+	No Ended 5/11/23	No Ended 8/31/21
Highmark BCBS	Highmark BCBS	Varies per state	Varies per state	Until 10/9/23 99441-99443 (all states) 98966-98968 (NY only)	Yes	02 or 10	Yes Required to use all telehealth modifiers	Yes	CMS+	No Ended 5/31/23 (except WV)	No Ended 12/31/21
Highmark BCBS Advantage	Highmark BCBS Medicare Advantage	Yes	Yes	99441-99443	Yes	02	Yes	Yes	CMS List	No Ended 5/31/23	No Ended 5/31/23 Inpatient Until 12/31/23
HMSA BCBS of Hawaii	HMSA	Yes	No 80% of in-person rate	99441-99443 Until 12/31/23 (only for mental health visits)	Yes	02 or 10	Yes	Yes	CMS+	No Ended 5/12/23	No Ended 1/1/23
Horizon BCBS NJ	BCBS NJ	Yes Until 12/31/23	No	99441-99443 Until 12/31/23	Yes	02 or 11	Yes	Yes	CMS List	No Ended 5/12/23	No Ended 6/30/21

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Humana Commercial	Humana	Yes	Yes	99441-99443	Yes	02 or 10	Yes (modifier 93 or 95)	Yes	CMS List	Yes Depends on member plan	No
Illinois BCBS Commercial	BCBS Illinois			99441-99443	Yes	02 or 10	Yes	Yes		No Ended 5/11/23	No Ended 12/31/20
Premera Blue Cross ****	Premera	No	No	99441-99443	Yes	02	Yes	Yes	Own List	No Ended 5/11/23	No Ended 6/30/21
Triple-S Commercial **	Triple-S MiTripleS	Yes	Yes	99441-99443	Yes	02	Yes Only for audio-visual Psychotherapy	Yes	Own List	Yes	Yes
Triple-S Medicaid**	Triple-S MiTripleS	Yes	Yes	99441-99443	Yes	02	No	Yes	Own List	Yes	Yes
Triple-S Advantage **	Triple-S MiTripleS	Yes	Yes	99441-99443	Yes	02	Yes Only for Annual Health Risk Assessment	Yes	CMS List	Yes	Yes
United Healthcare Commercial	UHC	Yes	Varies by State	99202-99215	Yes	02	No Optional	Yes	CMS List	No Ended 5/11/23	No Ended 12/31/20

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United Healthcare Medicare Advantage	UHC	Yes	Yes	99441-99443	Yes	02	Yes	Yes	CMS List	No Ended 5/11/23	No Ended 3/31/21
United Healthcare Medicaid	UHC	Yes	Varies by State	99202-99215	Yes	State specific rules	State specific rules	Yes	CMS+	Varies by State	Varies by State
Vermont BCBS***	Vermont BCBS	Yes	No Ended 1/1/22 For MHSUD only after	Specific List	Yes	02	Yes	Yes	Own List	Yes	Yes
Wellmark BCBS Commercial	Wellmark	Yes	No Ended 9/1/21	99201-99215 Ended 9/1/21	Yes	02	No	Yes	Own List	No Ended 5/11/23	No Ended 7/1/21

* Data last provided May 2020.

** Data last provided August 2021.

*** Data last provided December 2021.

**** Data last provided February 2023.

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