

At a Glance: 2025 E&M Changes

New Telehealth E&M CPT Code Set

For 2025 the American Medical Association added a list of telehealth E&M codes that mirror the office/outpatient new and established patient codes. There are audio/video codes and audio only codes. The former audio only codes 99441-99443 have been deleted. Below is a table of the new telehealth codes matched up with their in-person counterparts.

Telemedicine E/M CPT	RUC-recommended Work RVU	Modality	Level of Medical Decision-Making	Time Threshold (minutes)	New or Established Patient	In Person Equivalent	Current Work RVU
98000	0.93	Audio Video (A/V)	Straightforward	15	new	99202	0.93
98001	1.60	A/V	Low	30	new	99203	1.60
98002	2.60	A/V	Moderate	45	new	99204	2.60
98003	3.50	A/V	High	60	new	99205	3.50
98004	0.70	A/V	Straightforward	10	established	99212	0.70
98005	1.30	A/V	Low	20	established	99213	1.30
98006	1.92	A/V	Moderate	30	established	99214	1.92
98007	2.60	A/V	High	40	established	99215	2.80
98008	0.90	Audio only	Straightforward	15	new	99202	0.93
98009	1.60	Audio only	Low	30	new	99203	1.60
98010	2.42	Audio only	Moderate	45	new	99204	2.60
98011	3.20	Audio only	High	60	new	99205	3.50
98012	0.65	Audio only	Straightforward	10	established	99212	0.70
98013	1.20	Audio only	Low	20	established	99213	1.30
98014	1.75	Audio only	Moderate	30	established	99214	1.92
98015	2.60	Audio only	High	40	established	99215	2.80

CMS Telehealth Rules for 2025

CMS has opted to not accept the new codes created by the AMA. Below is a summation of the CMS rules for telehealth E&M visits in 2025.

- For audio/video visits continue to use the appropriate in-person E&M code with a 95 modifier appended, and the 03 or 10 place of service.
- For audio only visits, if the provider has video capabilities but the patient either does not or refuses to use video, use the appropriate in-person E&M code with a 93 modifier appended, and the 03 or 10 place of service.

Virtual Check-in Visits

For 2025 AMA created CPT code 98016, which mirrored the current HCPCS code G2012 for virtual check-ins lasting 5-10 minutes. CMS will eliminate HCPCS code G2012 and replace it with CPT 98016. Meanwhile, HCPCS code G2252, which covers virtual check-ins lasting 11-20 minutes, will remain unchanged as there is no corresponding CPT code.

CMS Complexity Code Update

For CY 2025, CMS will allow extra payments for complex office or outpatient visits (code G2211) when these visits occur on the same day as an annual wellness visit, vaccine administration, or any Medicare Part B preventive service, including the Initial Preventive Physical Examination (IPPE). This applies when the same practitioner provides both services on the same day.

Telehealth In General

Starting January 1, 2025, unless Congress acts, pre-COVID-19 restrictions on Medicare telehealth services will return, including geographic and location limitations and restrictions on eligible practitioners. However, CMS aims to retain some flexibilities and expand telehealth access where possible. We encourage you to reach out to your congressmen and voice your concerns relating to telehealth services in general. *Please note that CPT 77427 (physician OTV) is still on the list of approved telehealth services with a provisional status for 2025. OTVs done via telehealth require video and need a 95 modifier attached to the code.*

Questions? Contact your RBS team for more information.