

Telehealth Uncertainty Remains after 2026 Physician Fee Schedule

Digital Health

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While CMS finalized a number of telehealth policies in the 2026 Medicare <u>Physician Fee Schedule</u> (PFS) (see below), it did not include a prior telehealth provider enrollment flexibility that is set to expire December 31, 2025.

Previously, in the 2024 and 2025 PFS final rules, CMS stated that *through CY 2025* it would permit a distant site practitioner to use their currently enrolled practice location instead of their home address when providing telehealth services from their home. In the most recent CY 2026 PFS, however, CMS did not include language extending this flexibility for practitioners. This change has been <u>estimated</u> by an industry association to "result in up to a fortyfold increase in the number of billing addresses tracked and reported to CMS by a health system," and may add significant operational costs.

In response to privacy concerns raised by commenters, CMS noted that it has provided <u>information</u> on how to suppress street address details as providers. In addition, the agency noted that any updates related to the policy will be issued via subregulatory guidance. We'll continue to monitor and provide updates.

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