

CMS Proposes Significant Changes to RPM and RTM Services

[Digital Health](#)

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In the CY 2027 Medicare Physician Fee Schedule proposed rule, CMS is proposing several notable changes to Remote Physiologic Monitoring (RPM) and Remote Therapeutic Monitoring (RTM) services. First, CMS would limit RPM and RTM billing to established patients. CMS proposes requiring a separately billable initiating visit before RPM or RTM services begin, meaning the billing practitioner must initiate the services during an in-person or telehealth encounter. Additionally, CMS proposes that the clinical staff time used to furnish RPM and RTM services be provided only by individuals directly employed by the billing practitioner or practice, rather than outsourced third parties. CMS states that the proposal is responsive to multiple OIG reports raising concerns about care fragmentation and insufficient practitioner oversight when monitoring services are outsourced. Comments are due September 14, 2026.