



NATIONAL ASSOCIATION OF
Community Health Centers®

ELEVATE NATIONAL LEARNING FORUM



elevate®

Care Management & Reimbursement
March 11, 2025



THE NACHC MISSION

America's Voice for Community Health Care

The National Association of Community Health Centers (NACHC) was founded in 1971 to promote efficient, high quality, comprehensive health care that is accessible, culturally and linguistically competent, community directed, and patient centered for all.



NACHC Quality Center



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Who can see your messages? Recording On

To: Hosts and panelists ▾

Type

- Hosts and panelists
- ✓ Everyone

Unmute Stop Video Participants 2 Chat Share Screen Record Reactions Leave

During today's session:

- Type your questions in the chat feature.
- Be sure to select "Everyone"!
- There will be Q&A and discussion at the end.

Agenda



Welcome

HCC coding correction from February Learning Forum

Bringing it all together – AWWs, HCC coding, Care Management

Medicare care management – with FAQs answered by Lisa Messina, Messina Consulting

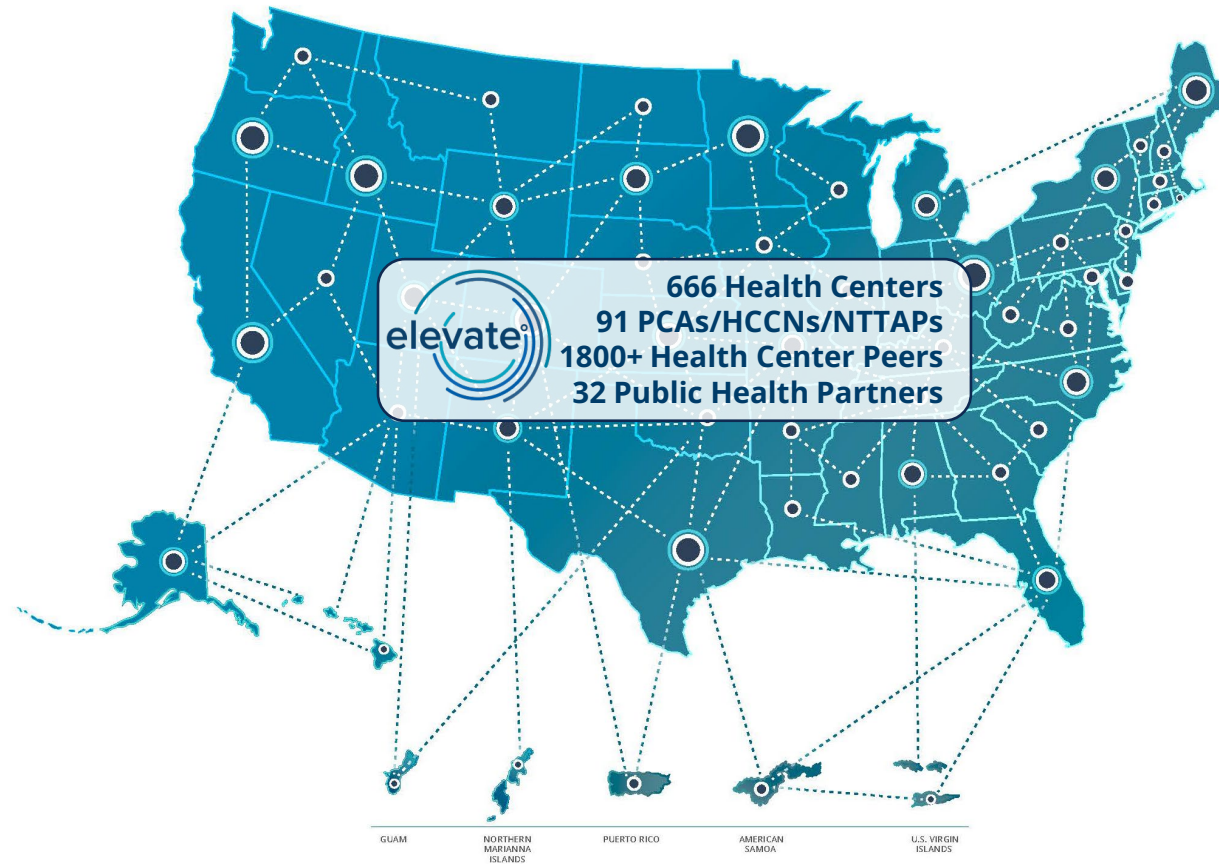
Community Health Integration

Chronic Care Management

Discussion and Q&A

Closing

Elevate 2025



**Share Elevate 2025
with others!**

bit.ly/Elevate2025Registration

***Elevate* is NACHC's national learning forum supporting health centers and partners to transform systems and enhance value**

Want to Learn More?

Elevate informational video (1 min)



Also visit NACHC's [Elevate webpage](#)

Value Transformation Framework (VTF) video (1 min)

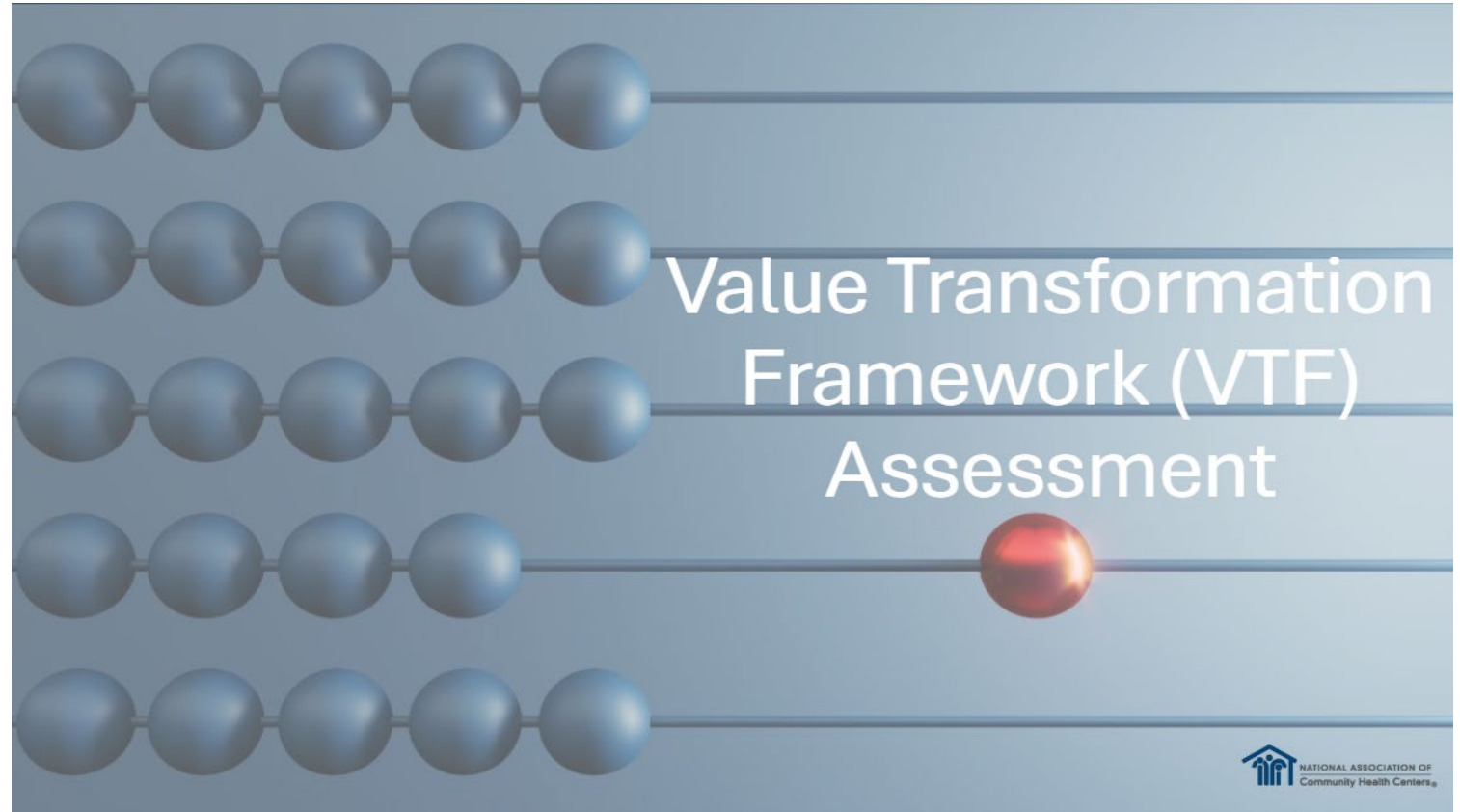


Also visit NACHC's [VTF webpage](#)

Assess Progress Toward Value!

[Value Transformation Framework \(VTF\)
Assessment video \(3 mins\)](#)

[Value Transformation Framework \(VTF\)
Assessment Instructions](#)



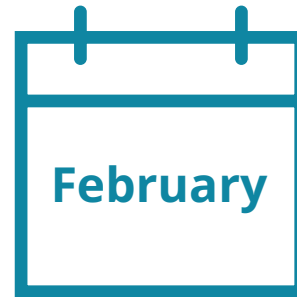
Elevate 2025 Launch

Elevate 2025 Launch: *Quarter 1 Medicare Focus!*



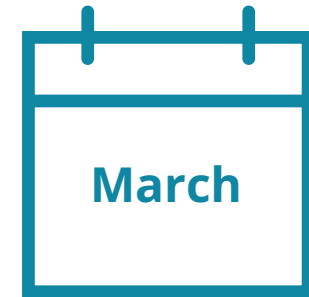
January

**Annual Wellness
Visits**



February

**HCC Coding &
Risk Adjustment**



March

**Care
Management**

February Correction!

Updates to the 2025 CMS HCC coding model (version 28) do not include Social Drivers of Health (SDOH) codes mapped to payment HCCs.

While it is still recommended to assess for SDOH and utilize ICD-10-CM codes (Z codes) for documentation, they will not contribute to a higher Medicare risk adjustment at this time. For more information on 2025 ICD-10-CM mappings, view this [CMS resource](#).

It is our highest priority to provide Elevate attendees with accurate information, and we offer our sincere apologies for this error. We have made the necessary corrections to the slide deck and the recording to prevent any further distribution of incorrect information.

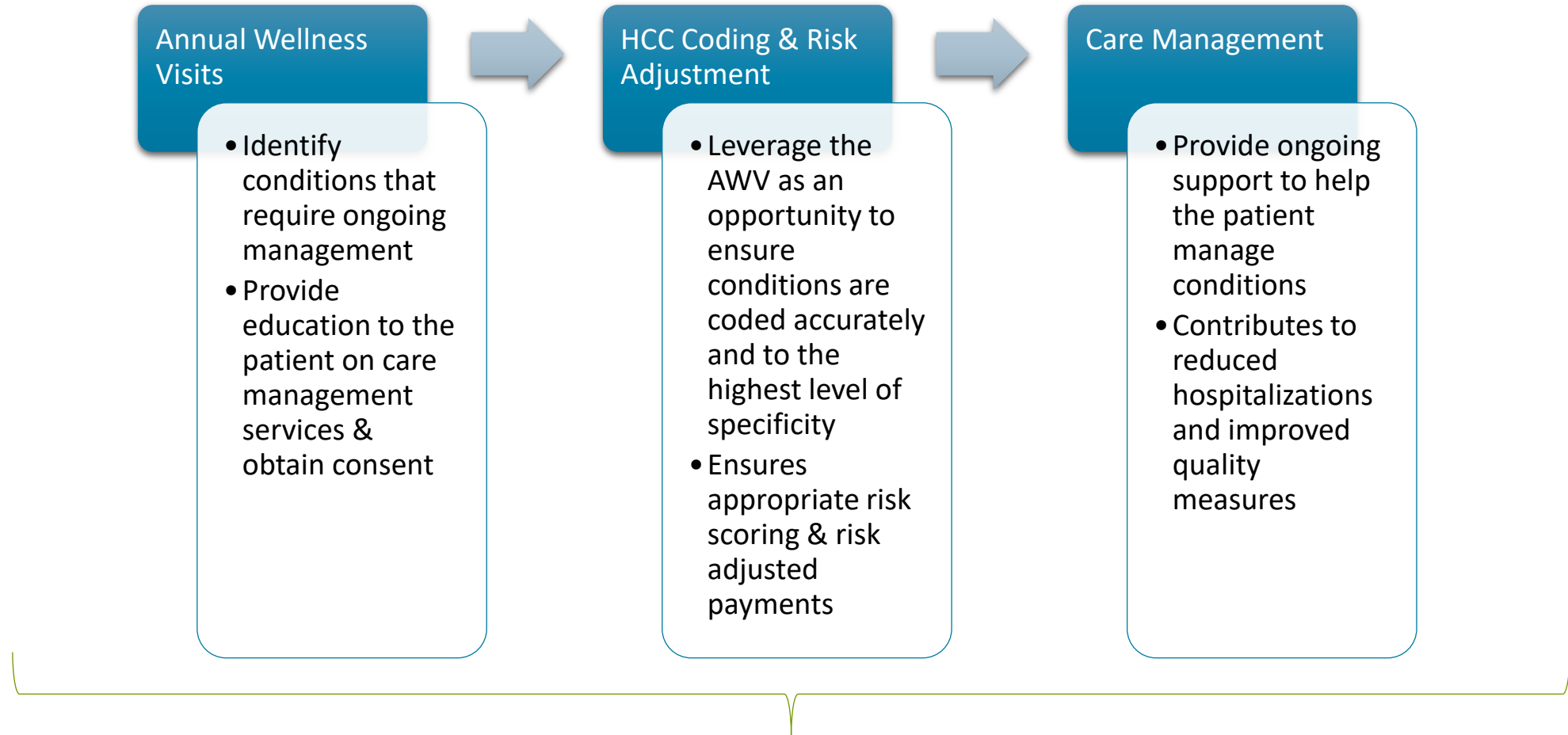
Why Medicare?

Why Medicare?

- ✓ Your feedback!
- ✓ Increasing segment of health center patient populations
- ✓ Increasing involvement of health centers in Medicare VBP arrangements
- ✓ Opportunities for reimbursement led by care team members other than the provider
- ✓ Workflows/promising practices can be extended to other patient segments (modifying as needed)



Bringing it all Together



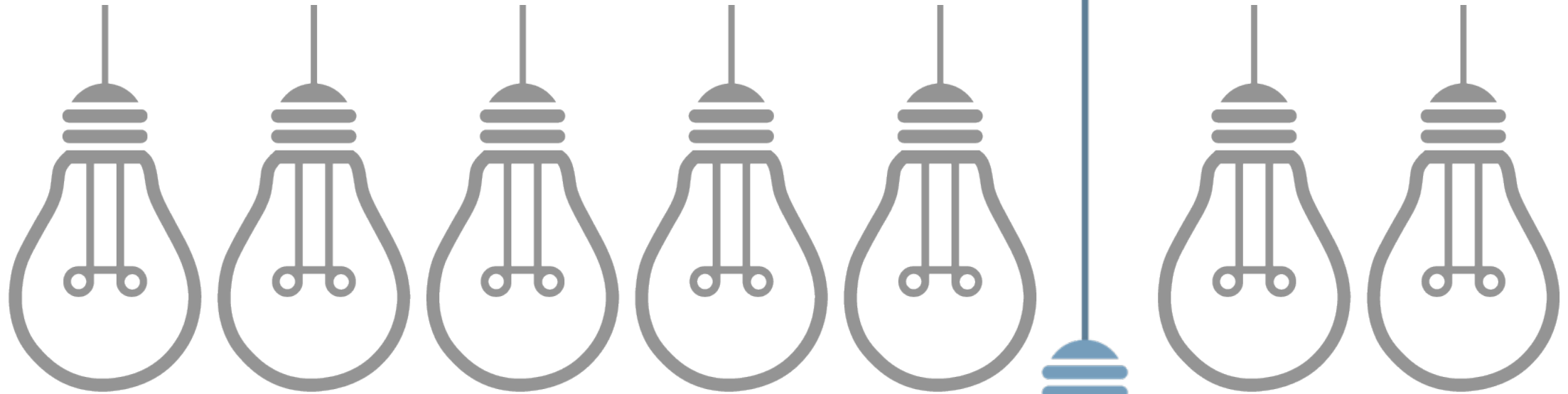
Value-based care revenue opportunities that reward health centers for managing high-risk patients effectively!

Featured Speaker



Lisa Messina, MPH, CPC, CPCO
Messina Consulting, LLC

Lisa Messina is an independent consultant and the Compliance Lead for the FQHC division of Coronis Health. Lisa has over 20 years of health care health information management and operations experience working in the inpatient, outpatient, community clinic, and physician practice arenas. She has conducted research and authored dozens of articles and blogs on coding, billing, and general compliance specific to community health centers.



FAQ:

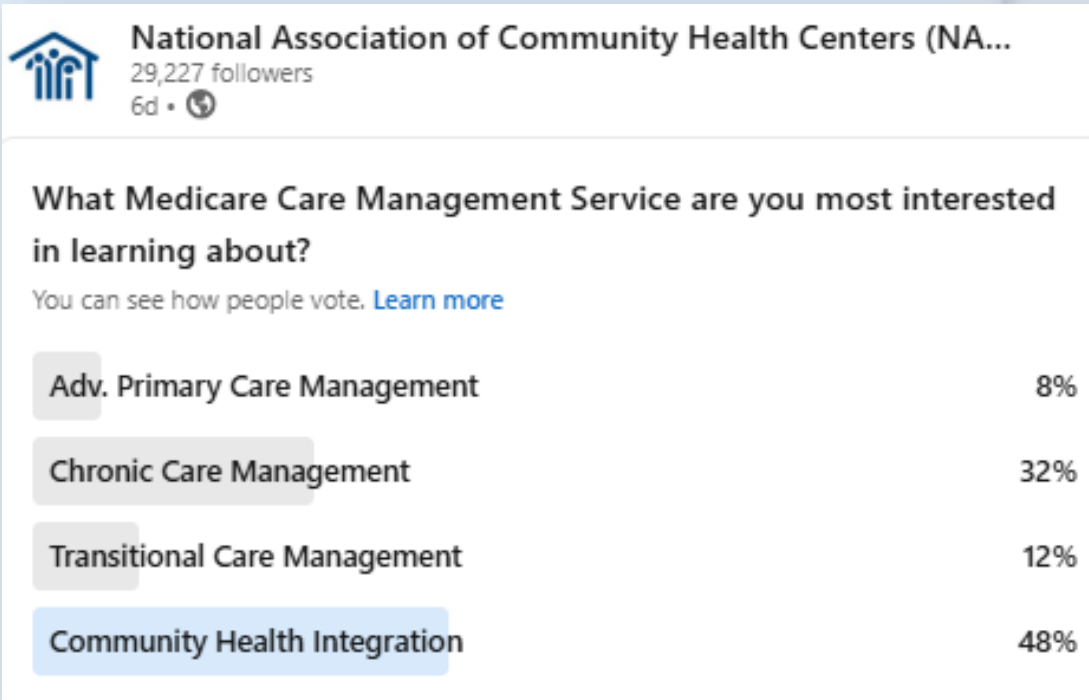
Why is an initiating visit, such as an AWW, required before providing (most) Medicare care management services?





Medicare Care Management Services

The Poll Responses Are In!



Community Health Integration

What are Community Health Integration (CHI) services?



Personalized and supportive services provided to patients with unmet social drivers of health (SDOH) needs that interfere with, or present a barrier to, the diagnosis, treatment, and self-management of illnesses, diseases, or conditions.

Eligible Patients:

- ✓ Medicare Part B beneficiaries.
- ✓ Provide consent for services.
- ✓ Have unmet SDOH need(s) that interfere with, or present a barrier to, the diagnosis and treatment of the problems identified during an initiating visit.
- ✓ Have been seen for an initiating visit prior to the start of services.

Community Health Integration

What are the service elements of CHI?

Services may be billed once per calendar month after at least **60 minutes** of services, including:

- Patient-centered assessment
- Coordination with home- and community-based resources
- Health education
- Developing self-advocacy skills
- Health care access and navigation
- Patient behavioral change facilitation
- Facilitate and provide social & emotional patient support



Community Health Integration

Who may provide CHI services?

Authorized Billing Providers

Who they are:

- Physicians (MD,DO)
- Nurse Practitioners (NP)
- Physician Assistants (PA)
- Certified Nurse Midwives (CNM)

What they do:

- ✓ Perform the initiating visit
- ✓ Determine medical necessity of CHI and order services.
- ✓ Obtain patient consent for services (verbal or written). If not obtained by billing provider, consent may also be obtained by auxiliary personnel under general supervision.
- ✓ Furnish services personally and/or via general supervision of auxiliary personnel as indicated by the service CPT code.
- ✓ Reviews any unmet SDOH identified by auxiliary personnel during their delivery of CHI services to determine if they should be included as part of the treatment plan.

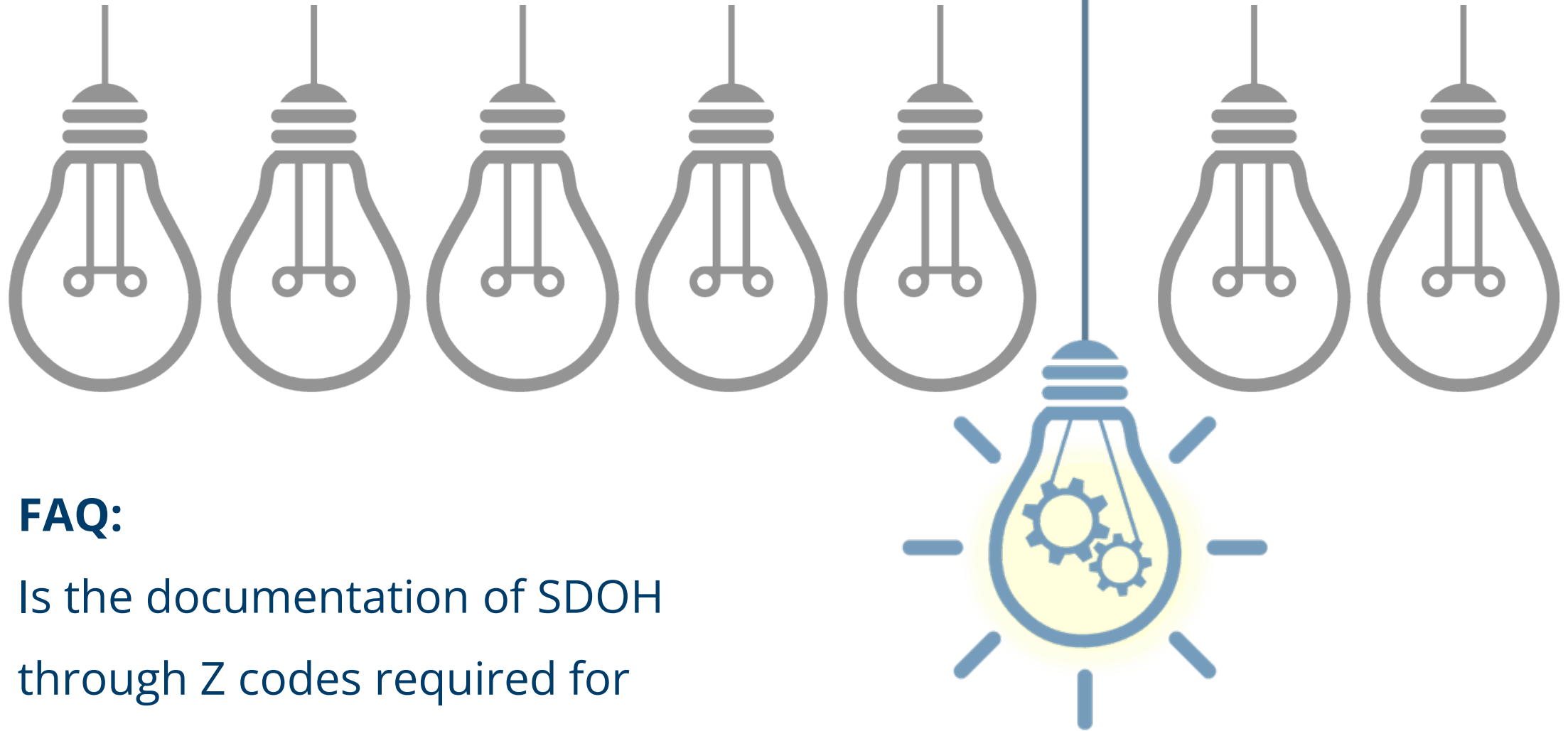
Auxiliary Personnel

Who they are (examples):

- Community Health Workers
- Nurses (nurse care manager, CNS, RN, LPN)
- Social Workers

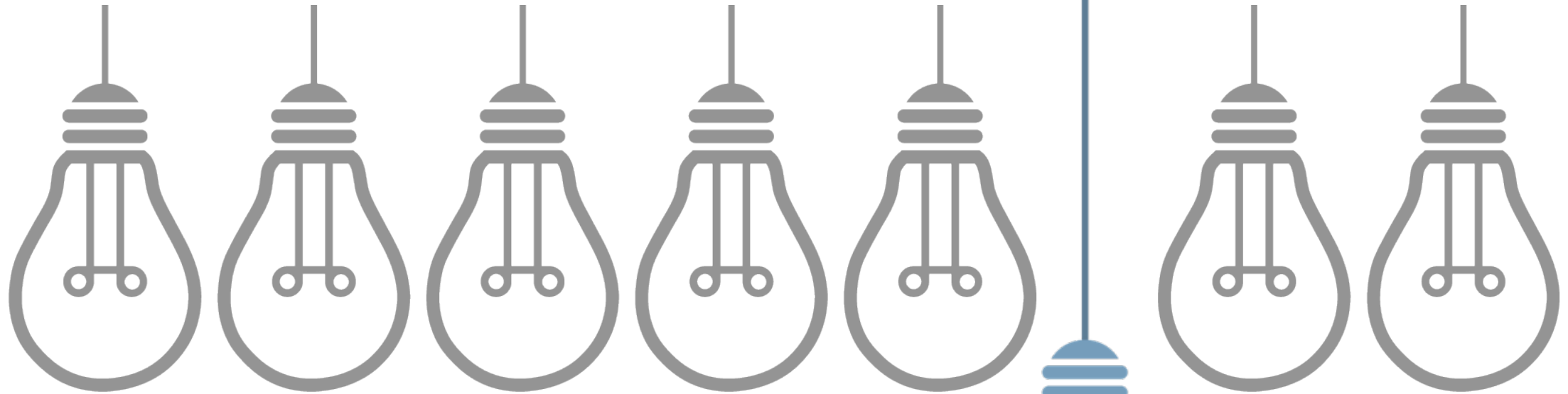
What they may do (under general supervision, and after the initiating visit has taken place):

- ✓ Obtain patient consent for services (verbal or written)
- ✓ Provide CHI services
- ✓ Document CHI service activities and time spent on such activities in the medical record.
- ✓ Communicate any newly identified SDOH concerns to the billing practitioner for review.



FAQ:

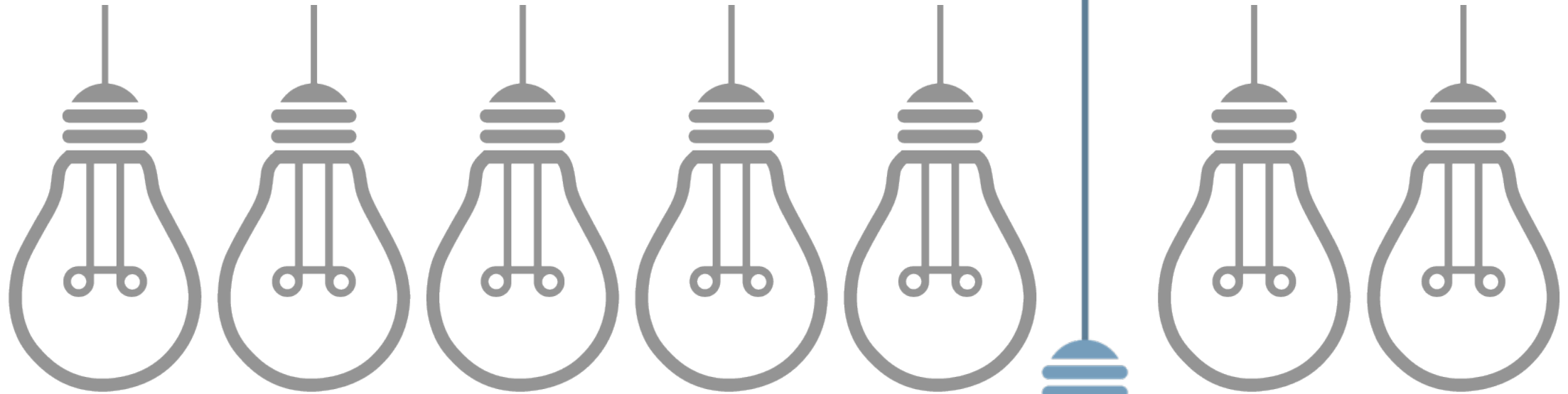
Is the documentation of SDOH through Z codes required for patient eligibility?



FAQ:

What is the difference between general supervision and direct supervision of auxiliary personnel?





FAQ:

Are there certification/training requirements for CHWs who provide CHI services?

Community Health Integration

Certification and training requirements for auxiliary personnel:

CMS specifically requires that in states where requirements for auxiliary personnel do not exist, they must be certified and trained in:

- ✓ Applicable knowledge of services, including community-based resources
- ✓ Communication (family and patient) and relationship-building skills
- ✓ Patient advocacy and facilitation
- ✓ Professionalism and ethical conduct
- ✓ Care coordination and health care/community systems navigation and assessment
- ✓ Patient advocacy and its facilitation
- ✓ Individual patient and community assessment
- ✓ Develop and strengthen the skills and abilities of the patient and family to improve access to health care and community services

Medicaid Opportunities for CHW Reimbursement

There are state-wide initiatives to amend Medicaid plans to authorize reimbursement for CHW activities!

Many states recognize the value CHWs provide in key areas like patient engagement, care coordination, and increasing access to clinical and support services for Medicaid patients.

Several states have received approval from the Centers for Medicare & Medicaid Services (CMS) for Medicaid State Plan Amendments (SPAs) that allow reimbursement for Community Health Worker (CHW) services.

This is a great [source](#) for health centers that would like to know what's happening in their states.

Chronic Care Management

What are Chronic Care Management (CCM) services?



Personalized and supportive services provided to patients with multiple chronic conditions to coordinate care and develop a care plan to achieve health goals.

Eligible Patients:

- ✓ Medicare Part B beneficiaries.
- ✓ Provide consent for services.
- ✓ Have multiple (two or more) chronic continuous or episodic conditions expected to last at least 12 months or until the patient dies, or that place the patient at significant risk of death, acute exacerbation/ decompensation, or functional decline; and, for which the authorized billing provider determines that CCM services are medically necessary.
- ✓ Have been seen for an initiating visit prior to the start of services.

Chronic Care Management

What are the service elements of CCM?

Services may be billed once per calendar month after at least **20 minutes** of services of services provided by auxiliary personnel, or at least **30 minutes** of services of services provided by the authorized billing provider, including:

- 24/7 access to clinical support staff
- Continuity of care with designated care team member
- Comprehensive assessment of medical, functional, and psychosocial needs
- Preventive care
- Medication management
- A comprehensive care plan created, monitored, revised, and shared with the patient/caregiver and other internal/external members of the patient's care team.
- Patient education and resources
- Care coordination



Chronic Care Management

Who may provide CCM services?

Authorized Billing Providers

Who they are:

- Physicians (MD,DO)
- Nurse Practitioners (NP)
- Physician Assistants (PA)
- Certified Nurse Midwives (CNM)

What they do:

- ✓ Perform the initiating visit
- ✓ Determine medical necessity of CCM and order services.
- ✓ Obtain patient consent for services (verbal or written). If not obtained by billing provider, consent may also be obtained by auxiliary personnel under general supervision.
- ✓ Furnish services personally and/or via general supervision of auxiliary personnel as indicated by the service CPT code.

Auxiliary Personnel

Who they are (examples):

- Nurses (nurse care manager, CNS, RN, LPN)
- Social Workers

What they may do (under general supervision, and after the initiating visit has taken place):

- ✓ Obtain patient consent for services (verbal or written)
- ✓ Provide CCM services
- ✓ Collect data relative to patient demographics, assessments, interviews, and outcomes
- ✓ Maintain and update, within scope of practice, the patient-centered care plan
- ✓ Provide 24/7 access to care

Meet Maria! An Elevate 2025 Patient Persona

[Meet Maria video \(2 mins\)](#)



*Which Medicare services
might Maria benefit from?*

Let us know in the chat!

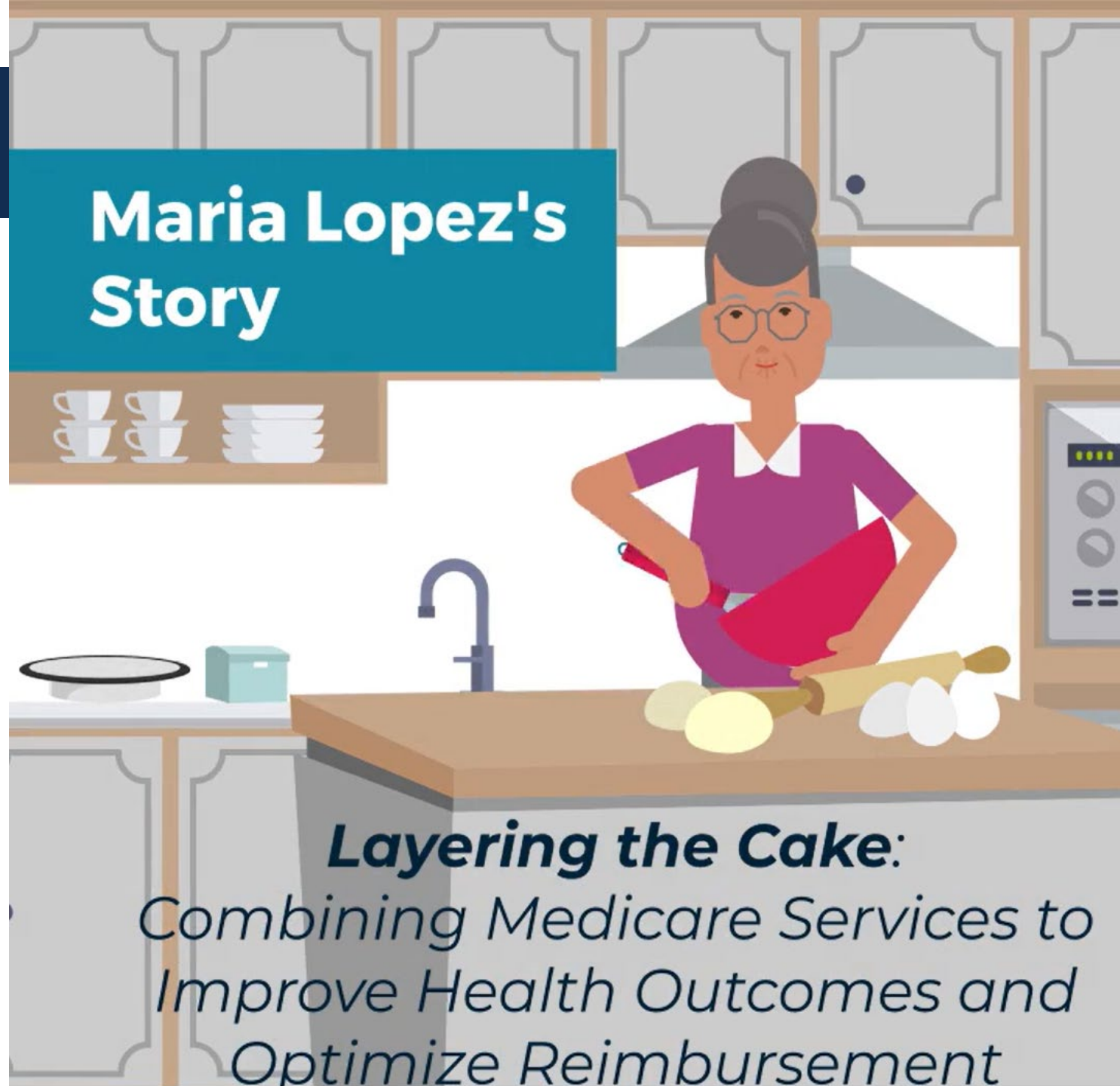
Maria's Example

How These Services Work Together: 'Layering the Cake'

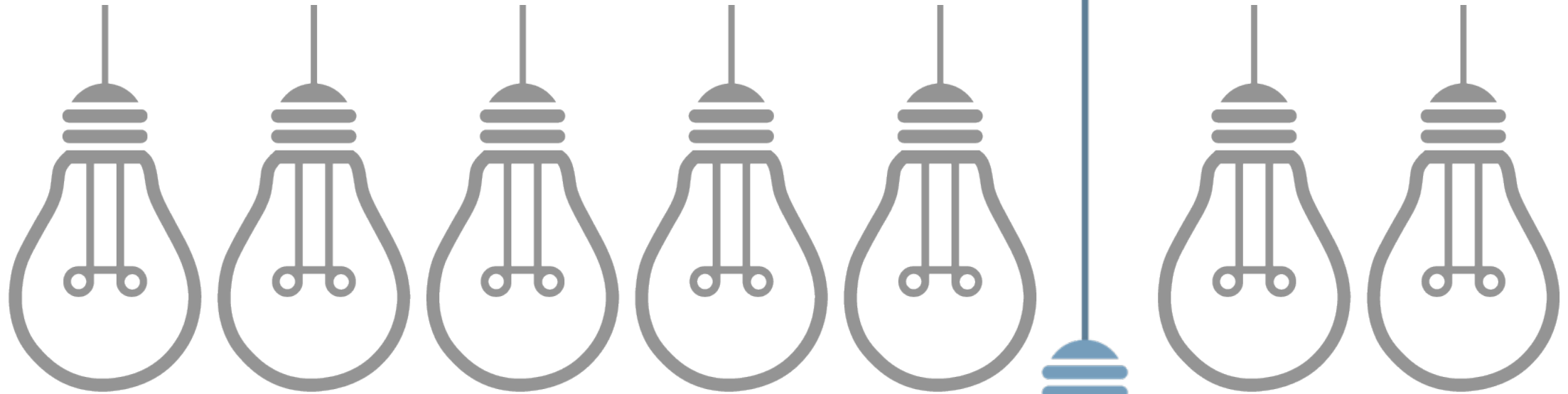
[Maria's Layer Cake video \(3 mins\)](#)

Video developed by NACHC based on the 'layer cake' concept for layering Medicare services originated by Lisa Messina, Messina Consulting, LLC.

Maria Lopez's Story



Layering the Cake:
*Combining Medicare Services to
Improve Health Outcomes and
Optimize Reimbursement*



FAQ:

What are the important changes to Medicare care management in 2025?

2025 Medicare Care Management

Unbundling of G0511, add-on codes, reimbursement amounts

CHI

G0019: **\$77.95** (60 mins)

+G0022: **\$48.52** (each additional 30 min)

Or continue billing G0511: \$54.67
until July 1, 2025

CCM

99490: **\$60.49** (20 min, aux. personnel)

+99439: **\$45.93** (each additional 20 min, aux. personnel)

99491: **\$82.16** (30 min, auth. billing provider)

+99437: **\$57.58** (each additional 30 min, auth. billing provider)

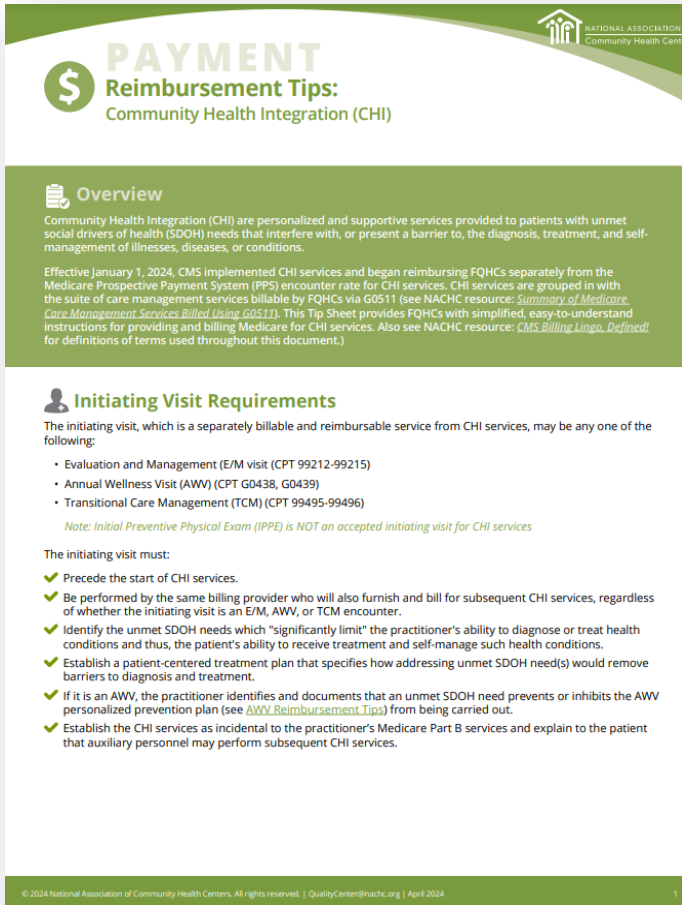
Or continue billing G0511: \$54.67
until July 1, 2025

*See Reimbursement Tip Sheets for full descriptions of CPT codes and documentation requirements



Medicare Care Management *Resources!*

Reimbursement Tip Sheets



Reimbursement Tip Sheets:

Detailed guidance

Simplified language

Aligned with 2025 Medicare Physician Fee Schedule Final Rule

Care Management:

- ✓ Chronic Care Management, Complex Chronic Care Management & Principal Care Management
- ✓ Transitional Care Management
- ✓ Chronic Pain Management
- ✓ Behavioral Health Integration
- ✓ Psychiatric Collaborative Care Management
- ✓ Community Health Integration
- ✓ Principal Illness Navigation
- ✓ Remote Physiologic Monitoring & Remote Therapeutic Monitoring
- ✓ **COMING SOON: Advanced Primary Care Management**

Reimbursement Tip Sheets

PAYMENT
Reimbursement Tips:
Medicare Wellness Visits: Initial Preventive Physical Exam (IPPE) & Annual Wellness Visits (AWV)

Overview
The Initial Preventive Physical Exam (IPPE) and Annual Wellness Visit (AWV) are personalized and supportive preventive Medicare Wellness Visits provided to patients to help assess and promote overall health and well-being.

- IPPE is also known as the "Welcome to Medicare Visit" and is intended to provide an initial assessment of a patient's health status and preventive care needs.
- AWV is intended to develop and update a personalized prevention plan based upon a patient's health status and risk factors.

This Tip Sheet provides FQHCs with simplified, easy-to-understand instructions for providing and billing for Medicare Wellness Visits. Also see NACHC resource: [Medicare Billing Lingo, Defined](#) for definitions of terms used throughout this document.

Initiating Visit Requirements
No initiating visit required prior to the start of IPPE and AWV services. However, IPPE and AWV qualify as an initiating visit for many Medicare care management services (see NACHC resource: [Summary of Medicare Care Management Services](#)).

Eligible Patients

IPPE	AWV
<ul style="list-style-type: none">• Available to Medicare beneficiaries within 12 months of enrolling in Medicare Part B• May be a new or established FQHC patient• Have not previously received an IPPE or AWV (within or outside the FQHC)• Provide consent for services	<ul style="list-style-type: none">• Available to Medicare beneficiaries after the first 12 months of enrolling in Medicare Part B and then every 12 months thereafter.• May be a new or established FQHC patient• Have not received an IPPE or AWV within the past 12 months (within or outside the FQHC)• Provide consent for services

Authorized Billing Providers
What they do:

- ✓ Obtain patient consent for services (verbal or written). If not obtained by billing provider, consent may also be obtained by auxiliary personnel under general supervision.
- ✓ Furnish IPPE services personally or, for AWV, via direct supervision of auxiliary personnel as indicated by the specific elements of the AWV service.
- ✓ Advance Care Planning (ACP) education, discussion, and documentation, as applicable

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Reimbursement Tip Sheets:

Detailed guidance

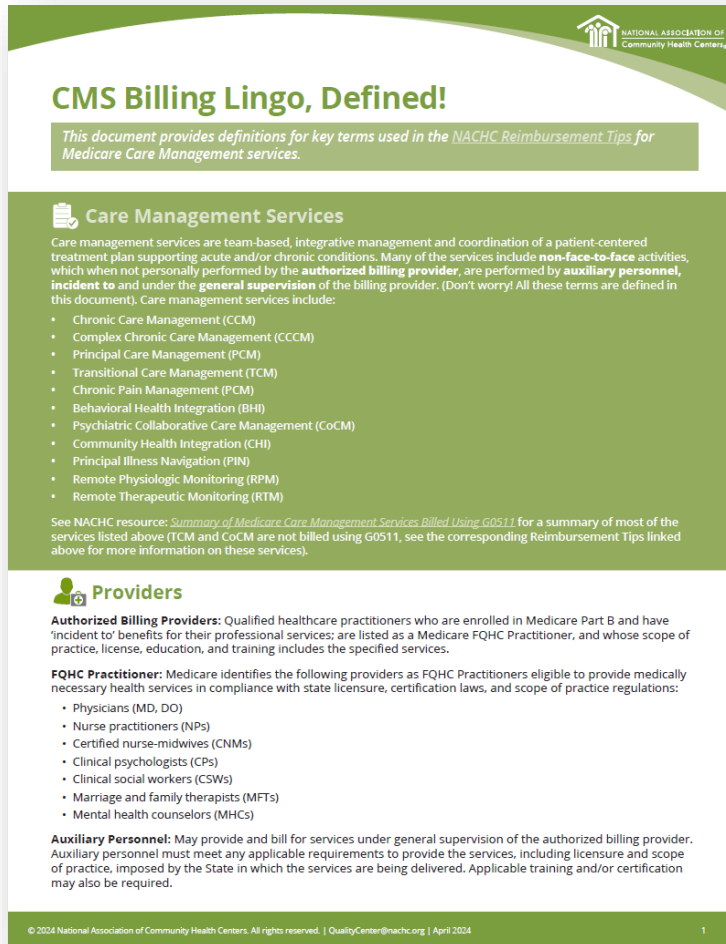
Simplified language

Aligned with 2025 Medicare Physician Fee Schedule Final Rule

Other Reimbursable Medicare Services:

- ✓ [Initial Preventive Physical Exam & Annual Wellness Visits](#)
- ✓ [Advance Care Planning](#)
- ✓ [Diabetes Self-Management Training & Medical Nutritional Therapy](#)
- ✓ [Tobacco Cessation](#)
- ✓ [Mental Health Telehealth](#)
- ✓ [Extended FQHC Telehealth Services](#)
- ✓ [Virtual Communication Services](#)

Medicare Billing Lingo, Defined!



CMS Billing Lingo, Defined!

This document provides definitions for key terms used in the *NACHC Reimbursement Tips for Medicare Care Management services*.

Care Management Services

Care management services are team-based, integrative management and coordination of a patient-centered treatment plan supporting acute and/or chronic conditions. Many of the services include **non-face-to-face** activities, which when not personally performed by the **authorized billing provider**, are performed by **auxiliary personnel**, **incident to** and under the **general supervision** of the billing provider. (Don't worry! All these terms are defined in this document). Care management services include:

- Chronic Care Management (CCM)
- Complex Chronic Care Management (CCCM)
- Principal Care Management (PCM)
- Transitional Care Management (TCM)
- Chronic Pain Management (PCM)
- Behavioral Health Integration (BHI)
- Psychiatric Collaborative Care Management (CoCM)
- Community Health Integration (CHI)
- Principal Illness Navigation (PIN)
- Remote Physiologic Monitoring (RPM)
- Remote Therapeutic Monitoring (RTM)

See NACHC resource: *Summary of Medicare Care Management Services Billed Using G0511* for a summary of most of the services listed above (TCM and CoCM are not billed using G0511, see the corresponding Reimbursement Tips linked above for more information on these services).

Providers

Authorized Billing Providers: Qualified healthcare practitioners who are enrolled in Medicare Part B and have 'incident to' benefits for their professional services; are listed as a Medicare FQHC Practitioner, and whose scope of practice, license, education, and training includes the specified services.

FQHC Practitioner: Medicare identifies the following providers as FQHC Practitioners eligible to provide medically necessary health services in compliance with state licensure, certification laws, and scope of practice regulations:

- Physicians (MD, DO)
- Nurse practitioners (NPs)
- Certified nurse-midwives (CNMs)
- Clinical psychologists (CPs)
- Clinical social workers (CSWs)
- Marriage and family therapists (MFTs)
- Mental health counselors (MHCs)

Auxiliary Personnel: May provide and bill for services under general supervision of the authorized billing provider. Auxiliary personnel must meet any applicable requirements to provide the services, including licensure and scope of practice, imposed by the State in which the services are being delivered. Applicable training and/or certification may also be required.

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Medicare Billing Lingo, Defined!

Supervision

General Supervision: Services provided by auxiliary personnel under a qualified practitioner's overall direction and control, but the practitioner's physical presence is not required during the performance of the service.

Direct "Incident To" Supervision: Services provided by auxiliary personnel, under a qualified practitioner's direction and control, and the practitioner must be physically present in the office suite, but not in the examination room, and immediately available to furnish assistance. Through December 31, 2024, direct supervision requirements may be met by the immediate availability of the supervising practitioner through real-time audio-visual technology.

Types of Visits

Visit: An FQHC visit must be a medically necessary, face-to-face, interactive medical or mental health or qualified preventive encounter between the FQHC practitioner and patient where one or more qualified FQHC services are provided.

Face-to-Face Services: One or more services furnished during a one-on-one, in-person encounter between a practitioner or as permitted, by auxiliary personnel, and a patient. (A telehealth visit is a substitution for a face-to-face visit.)

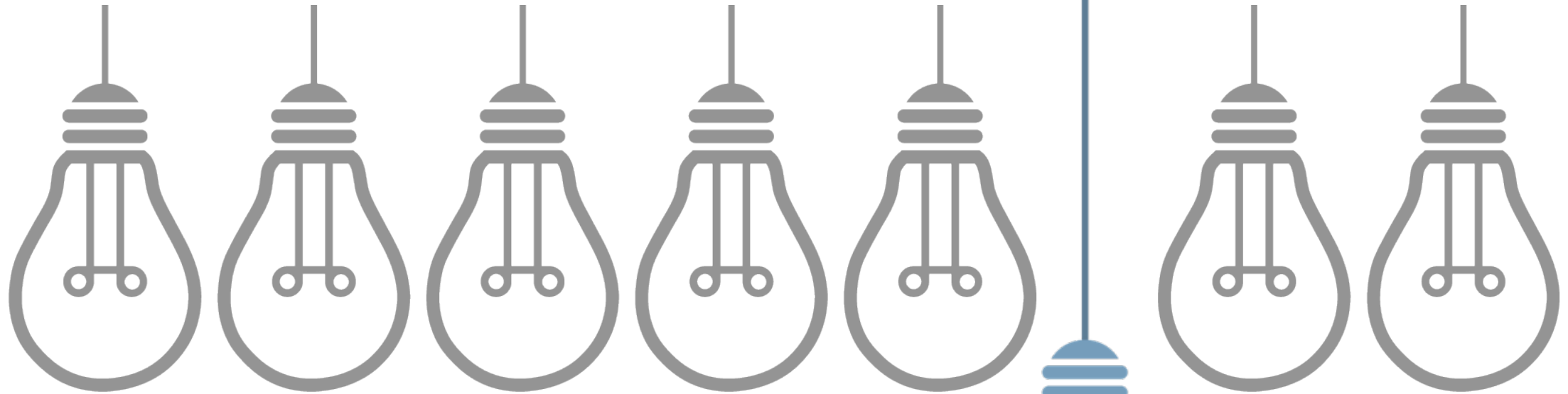
Non-Face-to-Face Services: One or more activities performed with or for a patient by a practitioner or, as permitted, by auxiliary personnel between office visits and as part of an established treatment plan. Examples of non-face-to-face activities may include phone calls, digital communication, questionnaire completion, and care management and coordination.

New Patient: Under Medicare, this is an FQHC patient who has not received any Medicare-covered professional health service (medical or mental health) from any site within the FQHC organization, or from any practitioner within the FQHC organization, within the past 3 years from the date of service.

Established Patient: Under Medicare, this is an FQHC patient who has received any Medicare-covered professional health service (medical or mental health) from any site within the FQHC organization, within the previous 3 years from the date of service.

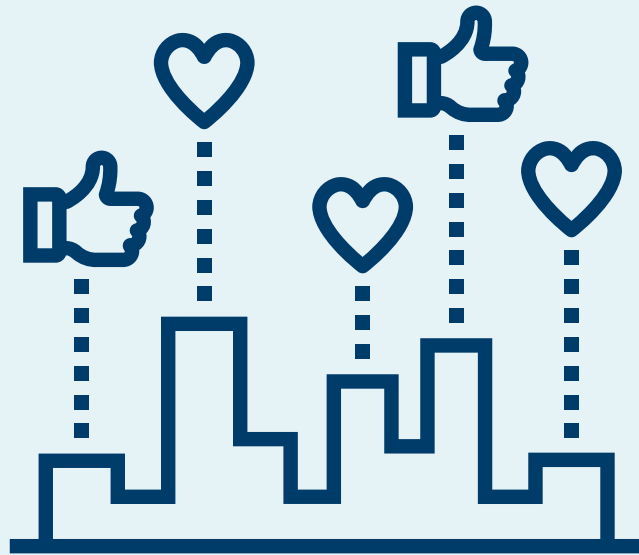
Telehealth Visit: Uses interactive audio and video telecommunications technology which permits two-way, real-time communication between the provider and patient. A telehealth visit is a substitution for a face-to-face visit. Flexibilities provided during the COVID-19 Public Health Emergency and extended through December 31, 2024 permit eligible FQHC practitioners to furnish qualified services on the [Medicare Telehealth Service List](#) as distant site including from the practitioner's home to a patient located in their home. During this extended period, telephone-only E/M services are included on the approved service list.

Originating Site: The location of the patient at the time the telehealth service is provided. Through December 31, 2024, the originating site includes the patient's home. Outside the PHE flexibilities and extension, only the FQHC and not the patient's home may be the originating site location for medical telehealth visits.



Discussion & Questions





Provide Us Feedback

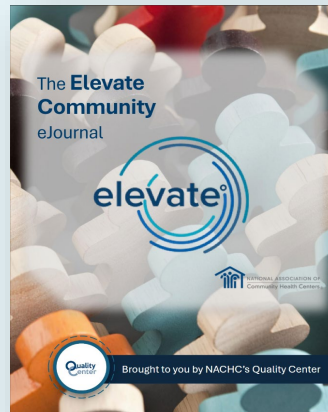
Elevate Communications

NACHC newsletters have been streamlined!

All future Elevate related communications can be found in

'NACHC News You Need to Know' sent out every Wednesday.

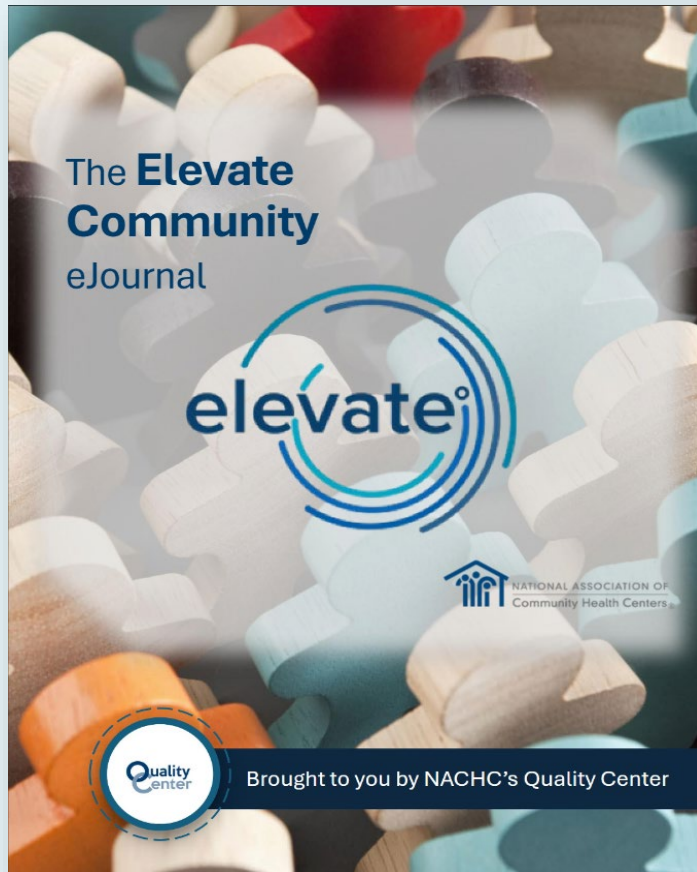
Including the NEW [Elevate Community eJournal](#)!



(All Elevate registrants have been added to the distribution list.)



Elevate Community eJournal



Includes:

- ✓ Elevate session slides & recordings
- ✓ Helpful resources
- ✓ Audience FAQs

Content will be added for every Elevate Learning Forum.

Bookmark the [link](#) for early access to session recordings and more!



[Elevate Community eJournal](#)

FOR MORE INFORMATION CONTACT
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Next Monthly Learning Forum:

Workforce: Trauma Informed Culture



April 8, 2024
1:00 – 2:00 pm ET



elevate°

**Together, our
voices elevate° all.**

The Quality Center Team

Cheryl Modica, Cassie Lindholm, Holly Nicholson, Tristan Wind

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