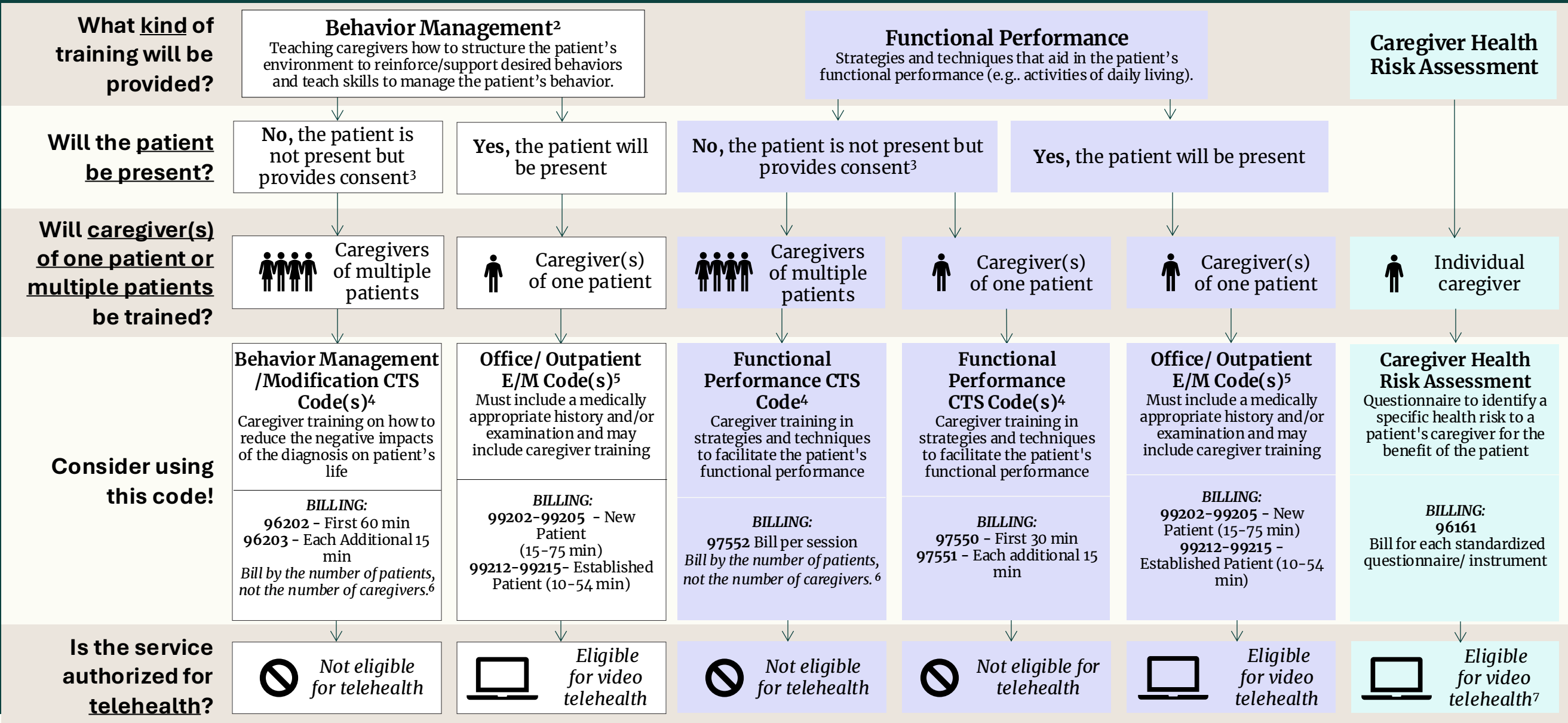


Billing Guide for Medicare Fee-for-Service Caregiver Training

If the answers to the two questions are “yes”, you can bill for caregiver training.

- A. Does a patient’s caregiver need training to support the patient’s treatment plan¹?
- B. Is the provider a physician or NPP?



Notes

1. A treatment plan is a patient-centered plan of care that appropriately accounts for clinical circumstances. Where the provider believes a caregiver's involvement is valuable to ensure a successful treatment plan and the patient agrees to caregiver involvement, caregiver training may be provided. Caregivers can play a key role in carrying out the treatment plans related to physical, occupational, or speech-language therapy, and other activities.
2. For mental health professionals, including clinical social workers, marriage and family therapists, mental health counselors, and clinic psychologists, there are additional Medicare billing codes available to involve families and caregivers in patient care.
3. Patient consent must be documented in their medical record, but a signed form is not required.

4. CTS Code Details:

- There is no limit to how many times CTS codes can be billed. The medical necessity should determine the volume and frequency of trainings (the quantity must be considered reasonable and necessary).
- CTS codes can be furnished in both facility and non-facility settings.
- CTS codes can only be furnished in-person.
- CMS proposes several updates to CTS under the CY 2025 Physician Fee Schedule, including to:
 - Create new billing codes for caregiver training in direct care strategies and techniques,
 - Create new billing codes for behavior management/ modification training furnished to the caregiver(s) of an individual patient, and
 - Add all currently payable and newly proposed CTS codes to the Medicare Telehealth Services List with “provisional” status.
- 5. The E/M codes listed can be used for in-office or other outpatient visits. Other E/M codes can be used for visits in private residences and alternate settings.
- 6. If patient A has two caregivers and patient B has three caregivers, the CTS code would be billed two times, one time per patient.
- 7. Audio-only telehealth available until December 31, 2024.

Definitions and Acronyms

Caregiver: An adult family member or other individual who provides assistance to a patient with a physical or mental limitation.

CTS: Caregiver Training Services is the term used to describe the new Medicare caregiver training billing codes.

Non-Physician Practitioners (NPPs): Includes nurse practitioners (NPs), clinical nurse specialists (CNSs), certified nurse-midwives (CNMs), physician assistants (PAs), clinical psychologists (CPs), clinical social workers (CSWs), marriage and family therapists (MFTs), mental health counselors (MHCs), physical therapists (PTs), occupational therapists (OTs), and speech-language pathologists (SLPs). To bill, NPPs must be qualified healthcare professionals practicing within their license.

Reasonable and Necessary: CTS may be reasonable and necessary when they are integral to a patient's overall treatment and furnished after the treatment plan is established. This is especially the case in medical treatment scenarios where assistance by the caregiver receiving the CTS is necessary to ensure a successful treatment outcome for the patient—for example, when the patient cannot follow through with the treatment plan for themselves.

