

## **RPM for Home Health Agencies.**

On October 31, 2018, CMS issued a [final rule](#) allowing home health agencies to include the costs of RPM among their reimbursable administrative expenses beginning in calendar year 2019. This rule defines RPM for purposes of the Medicare home health benefit as “the collection of physiologic data (for example, ECG, blood pressure, glucose monitoring) digitally stored and/or transmitted by the patient and/or caregiver to the HHA.” Although the Social Security Act prohibits payment for services furnished via a telecommunications system if such services are substituted for in-person home health services required under a patient’s plan of care, CMS concludes in its discussion of the rule that this prohibition does not apply to RPM because RPM does not involve any direct interaction between patient and provider. Accordingly, RPM does not replace in-person services required under the plan of care, but rather may be used by an HHA to more quickly identify changes in a patient’s condition and appropriately *update* the plan of care.