

Documenting Telehealth E/M Visits

- For *established* patients, a physical exam is not required to be documented to support the level of service selected, as long as the history and MDM are adequately documented.
- Generally, for *new* patients, a physical exam, History, and MDM must be documented to support the selected level of service; because of this, it is unlikely that a new patient would have a level of service greater than 3 (**99203**) during a telehealth visit. However, during the PHE, **level of service may be based on provider time**, even if providers do not meet 50% counseling rule.

For more detailed information about performing, documenting, and billing telehealth visits, refer to our [Telehealth E/M Visit resource](#).

“Bullets” refer to individual observations or exam findings. For a new patient with a Level 3 visits, only at least 2 organ systems need to be documented, with at least 6 separate findings noted. Click to view [guidance on conducting a telehealth physical exam](#).

Established Patients: Telehealth Visit Documentation to Support Level of Service

	Key Components	99212 Problem Focused (PF)	99213 Expanded PF	99214 Detailed	99215 Comprehensive
Document chief complaint and 2 of 3 key components	History	HPI: 1-3 ROS: N/A PFSH: N/A	HPI: 1-3 ROS: Pertinent PFSH: N/A	HPI: 4+ ROS: 2-9 PFSH: 1 of 3	HPI: 4+ ROS: 10-14 PFSH: 2 of 3
	Exam	Organ Systems: Pertinent Bullets: 1-5	Organ Systems: 2-7 Bullets: 6+	Organ Systems: 2-7 Bullets: 12+	Organ Systems: 8+ Bullets: All bold +1
	MDM	Straightforward	Low	Moderate	High
OR					
Document time & reason, if 50% of the visit is spent counseling. During the PHE, counseling requirements have been waived.		10 min	15 min	25 min	40 min

New Patients: Telehealth Visit Documentation to Support Level of Service

	Key Components	99201 Problem Focused (PF)	99202 Expanded PF	99203 Detailed	99204 Comprehensive	99205 Comprehensive
Document chief complaint and 3 of 3 key components	History	HPI: 1-3 ROS: N/A PFSH: N/A	HPI: 1-3 ROS: Pertinent PFSH: N/A	HPI: 4+ ROS: 2-9 PFSH: 1 of 3	HPI: 4+ ROS: 10-14 PFSH: 3 of 3	HPI: 4+ ROS: 10-14 PFSH: 3 of 3
	Exam	Organ Systems: Pertinent Bullets: 1-5	Organ Systems: 2-7 Bullets: 6+	Organ Systems: 2-7 Bullets: 12+	Organ Systems: 8+ Bullets: All bold +1	Organ Systems: 8+ Bullets: All bold +1
	MDM	Straightforward	Straightforward	Low	Moderate	High
OR						
Document time & reason, if 50% of the visit is spent counseling. During the PHE, counseling requirements have been waived.		10 min	20 min	30 min	45 min	60 min

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