

Memo

Date: 10/2/2025

To: Alameda County Behavioral Health Department (ACBHD) Providers of Behavioral Health

Services (SMHS & DMC-ODS)

From: Torfeh Rejali, Quality Assurance Division Director

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Subject: Telephone Evaluation and Management (E/M) Code Changes – Supersedes QA Memo

2024-49

This memo is to provide updated guidance when reporting telephone evaluation and management activities. This memo supersedes QA Memo 2024-49.

Background

CPT codes 99441-99443 (telephone evaluation and management by a physician or a physician extender, i.e., physician assistant, clinical nurse specialist or nurse practitioner) were discontinued by the American Medical Association (AMA) effective 1/1/25.

To replace these codes, the AMA created 98008-98011 (audio-only telemedicine visits for new patients) and 98012-98015 (audio-only telemedicine visits for established patients) as replacements. Initially, DHCS indicated these new codes would be available for SMHS and DMC-ODS by 7/1/25, however, the recently published DHCS SMHS and DMC-ODS billing manuals provides alternative guidance.

Additionally, as temporary guidance between 1/1/2025 to 6/30/2025, DHCS advised providers to use H2017 in SMHS and H0001 in DMC-ODS to report telephone evaluation and management.

Current DHCS Guidance

DHCS is now recommending clinicians use 99202-99205 or 99212-99215 with the corresponding telehealth place of service (POS)¹ and telephone modifier to report activities previously reported with 99441-99443. DHCS's guidance can be found in the FY25-26 SMHS and DMC-ODS billing manuals.

SmartCare is already set up to use 99202-99205 and 99212-99215 per DHCS requirements, including adding the telephone modifier when a telephone location is selected. ACBHD clinicians should immediately **discontinue** use of H2017/H0001 and switch to 99202-99205 and 99212-99215 when reporting telephone E/M. If telephone E/M services previously submitted as H2017/H0001 are still in *Show Status* in SmartCare, the codes should be corrected per guidance in this memo.

For questions, please contact QATA@acgov.org.

¹ ACBHD calls POS 'location'