

Centers for Medicare & Medicaid Services
Questions and Answers from Rural Health Open Door Forum
Wednesday, August 4, 2021

1. Quick question on the number of units that can be billed that you were just discussing on the therapy side. Does that then increase the number of units that can be billed to two 15 units, one with the modifier and one without? Or is it the same?
 - a. So we've identified a small number of cases where there are two units remaining to be billed. So in those cases specifically, we'd be allowing one 15 minute unit to be built with the CQ CO modifier to get back to the one minute issue that I talked about before that and at that point considering what the therapist billed versus what the therapist's assistant was doing, would allow for that for that unit to be bill without the CQ, the CO modifier.