Clinical Flagging System

2021 RPM rules changes

(after Public Health Emergency (PHE) regulations are lifted)

1. The mHealth technology supplied to a patient in an RPM program **must be defined as a medical device by FDA**.
2. Data **must be electronically (i.e., automatically) collected and transmitted** rather than self-reported.
3. After the PHE ends, **16 days of data must be collected** and transmitted every 30 days.
4. **Only physicians and NPPs who are eligible to furnish E/M services** may bill RPM services.
5. "interactive communication" for purposes of RPM requires, **at a minimum, a real-time synchronous, two-way audio interaction** that is capable of being enhanced with video or other kinds of data transmission.