

WellLink Supports Long-Term Telehealth Fix

Overview

Several key Medicare telehealth flexibilities expired on October 1, 2025, after Congress failed to pass a continuing resolution or full-year appropriations to fund federal agencies for the new fiscal year. This lapse affects how providers can deliver and bill for telehealth services to Medicare beneficiaries.

Key Telehealth Changes Effective October 1, 2025

The following Medicare telehealth provisions expired on September 30, 2025:

- Coverage for telehealth visits in a patient's home has ended. Medicare's originating site requirements have reverted to pre-pandemic rules, which limit telehealth reimbursement to patients physically present in qualifying medical facilities located in rural areas. Exceptions include:
 - Monthly end-stage renal disease visits for home dialysis.
 - Acute stroke services (regardless of location).
 - Mental health and substance use disorder (SUD) treatment services that meet all in-person visit requirements.
- Audio-only telehealth coverage for non-behavioral health services has ended. Audio-only visits remain allowed only when the patient is at home and video is technically feasible for the provider but not for the patient.
- Expanded telehealth provider eligibility has expired for occupational therapists, physical therapists, speech-language pathologists, and audiologists serving Medicare beneficiaries.
- Tele-behavioral health without in-person visits is no longer permitted. As of October 1, new patients must have an in-person visit within six months of starting tele-behavioral health services and at least once every 12 months thereafter. Exceptions include:
 - Patients located in rural areas and eligible originating sites.
 - Situations where travel poses excessive risk or burden, if both patient and provider agree to waive the in-person visit.
 - Patients receiving treatment for a SUD or co-occurring mental health condition.

Ohio Medicaid Telehealth Coverage

Unlike Medicare, Ohio Medicaid continues to support broad telehealth flexibilities. The Ohio Department of Medicaid (ODM) has maintained coverage for community-based mental health and substance use treatment services, including telehealth, at parity with in-person care. Providers should continue to follow ODM's telehealth guidance and billing requirements under Ohio Administrative Code 5160-1-18.

Next Steps and Provider Considerations

The Centers for Medicare & Medicaid Services (CMS) has instructed Medicare Administrative Contractors to place a temporary hold on claims for services affected by the waiver expirations. Providers who continue to deliver telehealth services that are no longer reimbursable should consider issuing an Advance Beneficiary Notice of Noncoverage (ABN) to patients.

If Congress reinstates the expired flexibilities through a future funding bill, retroactive billing may be permitted but only if explicitly authorized by law. Until then, providers face potential financial risk for telehealth services rendered after September 30, 2025.

Resources

- U.S. Department of Health and Human Services – [Telehealth Waiver Summary](#)
- American Hospital Association (AHA) – [July 2025 Fact Sheet on Telehealth Waivers](#)
- Centers for Medicare & Medicaid Services – [Provider Guidance on Waiver Expiration and Claims Holds](#)
- National Consortium of Telehealth Resource Centers – [Contingency Planning and Communications Toolkit](#)

WellLink Action

WellLink Health Alliance signed on to a [November 4, 2025, letter](#) urging Congress to immediately act on a long-term telehealth fix in its next legislative package to ensure stability and provide clarity for patients, providers, and the healthcare system as a whole.

Congress has extended telehealth flexibilities multiple times immediately prior to the looming deadlines. Unfortunately, failure to do so this year has led to an abrupt end to telehealth services for millions of Medicare beneficiaries. This cycle of temporary fixes has resulted in patients and providers facing continued disruptions in care.