RPM and Telehealth Program Build Consulting

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What to have ready

None of this has to be finished before you call. Each item ties to the CMS text that makes it matter.

- Your service model: RPM, remote therapeutic monitoring (RTM), telehealth visits, or a mix. MLN901705 treats RPM and RTM differently (MLN901705, December 2025, p. 13 [https://www.cms.gov/files/document/mln901705-telehealth-remote-patient-monitoring.pdf]).
- How you will confirm an established patient relationship before RPM enrollment (MLN901705, p. 13 [https://www.cms.gov/files/document/mln901705-telehealth-remote-patient-monitoring.pdf]).
- Your current consent process and where consent is recorded, since CMS requires "patient consent at the time you provide RPM services" (MLN901705 [https://www.cms.gov/files/document/mln901705-telehealth-remote-patient-monitoring.pdf]).
- Vendor documentation for each device, since it "must meet the definition of a medical device defined by FDA" (MLN901705 [https://www.cms.gov/files/document/mln901705-telehealth-remote-patient-monitoring.pdf]).
- How your platform counts days of data in each 30-day period (2–15 or 16+ days, by code) (MLN901705 [https://www.cms.gov/files/document/mln901705-telehealth-remote-patient-monitoring.pdf]).
- How you will confirm that no other practitioner bills remote monitoring for the same patient in the same 30-day period (MLN901705 [https://www.cms.gov/files/document/mln901705-telehealth-remote-patient-monitoring.pdf]).
- Your staffing plan, naming the billing practitioners and the auxiliary personnel they supervise (MLN901705 [https://www.cms.gov/files/document/mln901705-telehealth-remote-patient-monitoring.pdf]).
- The 2026 remote monitoring codes your billing staff expect to use, including whether 99445 and 99470 apply (Federal Register, 2025-19787 [https://www.federalregister.gov/documents/full_text/html/2025/11/05/2025-19787.html]).
- For telehealth visits, the audio and video equipment you will use, measured against 42 CFR 410.78(a)(3) (eCFR, current text [https://www.ecfr.gov/api/renderer/v1/content/enhanced/current/title-42?part=410&section=410.78]).
- Where your Medicare telehealth patients will be located after December 31, 2027 (CMS Telehealth FAQ, updated 2/26/26 [https://www.cms.gov/files/document/telehealth-faq-updated-02-26-2026.pdf]).