Telehealth: An Introduction to Implementation and Policy Considerations

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Overview

• What is telehealth, how can it be used in care delivery, and what does it aim to accomplish?

• Value and challenges of telehealth

• National telehealth landscape

• Telehealth implementation

• Telehealth policies and compliance
Definitions: Telemedicine and Telehealth

- **TELEMEDICINE** defined as:

  “the use of medical information exchanged from one site to another via electronic communications to improve a patient’s clinical health status.”

- **TELEHEALTH** defined as:

  “a broader definition of remote healthcare that does not always involve clinical services, ATA uses the terms in the same way one would refer to medicine or health in the common vernacular.”
How Can Telehealth be Used in Care Delivery?

**Telehealth Modalities**

- Remote patient monitoring
- Live video (synchronous)
- Store-and-forward (asynchronous)
- Mobile health (mhealth)
Telehealth Technology and Devices

- ECG Glove
- Otocam
- USB Otoscope
- Total-Exam HD Camera
- Total-Exam Camera
- Portable Vital Signs Monitor
- Digital Spirometer
- Telemedicine cart
Examples of Telehealth Use Cases

Emergency Services
- Tele-stroke
- EMS telemedicine

Safety
- Telemedicine for correctional health care
- In home telemonitoring and after hours care

Specialty Care Access
- Tele-ICU
- Psychological consults in rural areas
What is the Value of Telehealth?

**Quality**
- Improved access to specialists
- Improve clinical outcomes
- Engage patient in their care

**Cost**
- Reduce unnecessary ED utilizations
- Prevent avoidable transfers
- Reduce travel costs

**Satisfaction**
- Increase access to care when patients need it the most
- Provide care in the most comfortable environment
Telehealth Challenges

- **Limited Reimbursement** is available from commercial payors, Medicare and Medicaid, but little incentive exists for providers to move away from traditional models of care delivery
- **Limited Widespread Awareness** about how to incorporate the effective use of telehealth into existing practice workflows
- **Lack of Innovative Use Cases** that demonstrate the value of telehealth on hospital encounters and in improving access to care...but growing
- **Medical Liability Insurance** for services delivered through telehealth is not always offered
- **Licensure** barriers to practice across state lines
National Telehealth Adoption

American Telemedicine Association - 2015
  • 200 Telemedicine networks in the USA
  • 3,500 service sites
  • 75 million telehealth visits in North America in 2014
  • Predict +/- 50% of health care provided remotely in five years

American Hospital Association – January 2013
  52 percent of hospitals utilized telehealth and 10 percent were beginning the process of implementing telehealth services

HIMSS Analytics Study
  • 58 percent of hospitals in 2015 and 61 percent in 2016
  • 12 percent adoption of remote patient monitoring
Telehealth Implementation
Assess and Evaluate Technology

- Conduct comprehensive assessment of appropriate technology
  - Assess technology against defined criteria aligned with the project’s and organization’s goals
  - Project and future needs
  - Implementation setting and physical space
  - Technology that is targeted to meet the needs of the specific patient population that will use it
  - Integration of EHRs or other systems
Assess and Evaluate Technology Use (cont.)

- Ensure technology functioning
  - Secure adequate Bandwidth and Wi-Fi connectivity
  - Some facilities required boost in bandwidth and improved reliability of wifi connectivity
  - Conduct weekly technology checks

- Technology staff
  - Coordination with IT staff from each entity
  - Ability to train clinical staff
  - Ability to provide support to hospital or LTC facility when needed
Analyze and Adjust Workflow

• Develop workflow charts, and specific protocols
• Ensure seamless integration into routine
• Assess, reassess and adjust workflows when needed to optimize use
Train Staff

- Hold educational training meetings
- Develop online on-demand videos
- Training by mentor/champion
- Staff retraining and frequent opportunities to test the use of the telehealth equipment is important to ensure successful telehealth encounters and continued use and competencies
Educate and Engage Consumers

- Educating patients and families prior to the use of telehealth increases acceptance and willingness to use telehealth
- Use marketing material, including videos
- Ensure patient has a trusted single point of contact for technical and clinical issues
- Include family members
- Implement on-demand videos
- Complete consent document
Secure Physician and Nurse Champions

- Early identification and ongoing involvement of physician and nurse champions is essential to the success of a telehealth project.

- Physician champions provide leadership and are role models for the whole organization, ensuring hospital staff are prepared to implement telehealth.

- Nurse champions are essential in the long term care facility to support the patient, utilize the technology and communicate with hospital physicians.
Cost Savings & Sustainability

- This

- that

- All three programs are expanding their telehealth programs to other facilities or departments
Telehealth Policies and Compliance
Professional Liability Coverage

• Carriers’ coverage of telehealth practices may not be clearly outlined in the policy language

• Coverage can vary widely by carrier including:
  • Telehealth as an included service
  • Requiring a supplemental policy
  • Not providing any coverage for telehealth services

• Physicians should work with carrier to determine if telehealth coverage is available and the extent of coverage allowed under their policy

• Carriers may assess telehealth practices including
  • Practicing over state lines
  • Providing treatment only to patients with a pre-existing relationship
Provide Security and Privacy Protections

- HIPAA compliant technology
- Risk assessment
- Include as part of enterprise privacy and security audits
- Business Associate Agreement (BAA) with their partners and telehealth technology vendors
  - BAA outlines the security controls in place and makes clear the ownership of data and future access to the data once a contract ends
Reimbursement
Medicare Telehealth Coverage

• Medicare Part B (Medical Insurance) covers certain telehealth services if the patient lives in qualified rural areas.

• Services covered include, office visits and consultations that are provided using an interactive two-way telecommunications system (with real-time audio and video) by a doctor or certain other health care provider who is not at a patient’s location and the patient is located at one of the following:

  • Doctor’s office
  • Hospital
  • Critical access hospital (CHA)
  • Rural health clinic
  • Federally qualified health center
  • Hospital-based or critical access hospital-based dialysis facility
  • Skilled nursing facility
  • Community mental health center

Source: https://www.medicare.gov/coverage/telehealth.html
Medicaid Telehealth Coverage

States have the option to determine:

• Whether to cover telemedicine
• What types of telemedicine to cover
• Where in the state telemedicine will be covered
• How it will be provided and covered
• What types of telemedicine practitioners may be covered
• How much to reimburse for telemedicine services

Private Payor Telehealth Coverage

Source: A. Gilroy (2017), Jones Day

While best efforts have been made to provide current information, please note that legislation on this topic is quickly evolving. Assumptions have been made as part of categorization for purposes of this illustration. State legislation is not identical.
Payment “Parity” in Payor Legislation

Source: A. Gilroy (2017), Jones Day
Diversity in Legal and Regulatory Requirements

Practice Standards and Licensure
Establishing a Provider Relationship

While best efforts have been made to provide current information, please note that legislation on this topic is quickly evolving. Assumptions have been made as part of categorization for purposes of this illustration. Where a state’s requirements incorporate multiple categories, the most onerous category is illustrated. State legislation is not identical.

Source: A. Gilroy (2017), Jones Day
Practice Standard – Technical Requirements

While best efforts have been made to provide current information, please note that legislation on this topic is quickly evolving. Assumptions have been made as part of categorization for purposes of this illustration. Technical Requirements assumes a variety of different technical specifics. State legislation is not identical.

Source: A. Gilroy (2017), Jones Day
Practice Standard – No “Audio-Only”

While best efforts have been made to provide current information, please note that legislation on this topic is quickly evolving. Assumptions have been made as part of categorization for purposes of this illustration, and a conservative interpretation has been utilized. State legislation is not identical.

Source: A. Gilroy (2017), Jones Day
Practice Standard – Asynchronous

States with Telehealth Limitations for Non-Real-time or Store & Forward Models

While best efforts have been made to provide current information, please note that legislation on this topic is quickly evolving. Assumptions have been made as part of categorization for purposes of this illustration. Certain telehealth models (e.g., teleradiology and telepathology) may still be allowed in some of the noted jurisdictions. State legislation is not identical.

Source: A. Gilroy (2017), Jones Day
Practice Standard – Other Items

- Consent
- Identify of Provider
- Medical Records
- Referral Sources – emergency
- Continuity of Care
# Licensure

## Special Telehealth/Conditional/ Special Purpose License

- Louisiana
- Minnesota
- Nevada
- New Mexico
- Ohio
- Oregon
- Tennessee
- Texas

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<tr>
<th>Out of State Registration</th>
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<td>- Florida</td>
<td>Al, AZ, CO, ID, IL, IN, KS, MN, MS, MT, NV, NH, PA, SD, UT, WV, WI, WY</td>
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<td>- Maine</td>
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<td>- New Mexico</td>
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Diversity in Requirements - Checklist

• Know your organizations role
• Establish process for ongoing monitoring of requirements
• Verification and authentication of patient location and identity
• Disclosure and validation of provider’s identity and credentials
• Use appropriate technology, including real-time vs. asynchronous
• Understand industry and professional society guidelines
• Obtain appropriate consents
Any Questions?
Thank You!

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Visit MHCC Telehealth website for more resources