Emergency Telemedicine Approaches

Key takeaways of the telehealth coverage policies in the time of COVID-19

- Restrictions on provider and patient location have been relaxed (I.e. Telehealth services can now be provided regardless of where the enrollee is located geographically and type of site).
- "These visits are considered the same as in-person visits and are paid at the same rate as regular, in-person visits"
- Further details in CMS fact sheet: https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet

What are the current options for servicing Medicare patients remotely and be reimbursed?

- **Telehealth Visits**: **regular visit, but concluded over video conferencing**. Requires an interactive video and audio communication between patient and provider, so **a camera is required**. Laptop with a camera, separately attached camera, or phone camera (if the software platform used has an app). **Reimbursed as a regular visit**, however there is lack of clarity around physical examination component.

- **Virtual Check-ins**: **brief live discussion over the phone** or over video. Restrictions: must be an established patient, must not be related to a medical visit that occurred within the last 7 days, must not lead to a new visit, patient must consent. NEEDS CLARIFICATION, Medicare site says that it must be synchronous, but then says provider can respond over portal/text message. **Reimbursed at $10-$15**.

- **E-visits: E&M done via patient portal only, through multiple written communications, within the span of 7 days.** Restrictions: only levels 1,2,3, must be concluded within 7 days and has time requirements. **Reimbursed at $15-$20**.

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Quick Start

Recommended approach

General
1. Designate a task force and main point of contact in the practice for all Telehealth related issues. Distribute the contact list.
2. Select a platform
3. Develop and implement Telehealth documentation and billing guidelines (samples coming soon)
4. Develop and implement HIPAA guidelines for home office access (samples coming soon)
5. Develop and communicate standard operating procedures and workflow changes for Telehealth visits (samples coming soon)
6. Prepare your EHR/PM system for Telehealth
   a. Create Telehealth specific documentation templates
   b. Add Telehealth specific billing codes and rules
7. Implement a real time HIPAA compliant chat for internal staff to facilitate timely communication. Keep in mind that your EMR or existing platforms may already offer HIPAA compliant messaging. Here is a sample list of vendors. https://medevel.com/10-hipaa-complaint-messaging-chat-livechat-telemedicine/

Best short-term approaches

- Contact your EMR/PM vendor to check for availability and ensure the solution meets your needs. Some vendors may require hardware that is currently unavailable (I.e. external video-cameras).
- If your EMR does not offer an integrated solution consider Zoom or similar massively scalable solutions that work across multiple platforms and do not require disclosing personal contact information.
- Also consider commercial Telemedicine platforms (See section below)
- Other solutions may include mainstream platforms like Skype and Facetime that are allowed on an emergency basis. Please Note: Facebook Live, Twitch, TikTok, and similar video communication applications are all public facing, and should **not** be used in the provision of telehealth by covered health care providers

Is there a HIPAA issue I should be concerned with?

- No, not in the short-term. FaceTime is still not HIPAA approved, however recently published communication indicates that fines will be waived when used in good faith for any telehealth treatment or diagnostic purpose, regardless of whether the telehealth service is directly related to COVID-19. Full text here: https://www.hhs.gov/about/news/2020/03/17/ocr-announces-notification-of-enforcement-discretion-for-telehealth-remote-communications-during-the-covid-19.html
- Keep in mind that with some of these solutions, physicians may need to provide their personal cell phone numbers.

Should I use a video conferencing solution in conjunction with my EMR?

- When possible utilize a HIPAA compliant video conferencing tool, however during this national emergency this has been relaxed. A list has been published here: https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html
  - Skype for Business
  - Updox
  - VSee
  - Zoom for Healthcare
  - Doxy.me
  - Google G Suite Hangouts Meet
  - Make sure you select the HIPAA compliant version, which may include a BAA between you and the vendor.
- The chosen tool is used only for the actual video conferencing, and scheduling/billing/documentation of visit still resides in the EMR platform.
- This approach offers the least amount of modifications to current documentation practices.
- The business-oriented vendors in this list (Google, Zoom, etc) typically require email address to send invites. A way to avoid providing a physician email when utilizing one of these tools (if it is required) is to use a generic practice email or patient portal / texting to distribute invites to patients

Commercial telemedicine platforms

- GI On Demand: ACG has formed a partnership with this provider. It is a comprehensive telemedicine tool, that allows for managing patient reach out, virtual waiting room, billing options. It does require synchronization of data, either via interface or manually. It can be useful to monitor EMR discussion groups. If you are not part of any the discussion group, here is a link to a popular one amongst GI practices. go to http://groupspaces.com/GIemrDiscussion/ .
- Some other generic vendors with similar pricing and setup requirements: MendFamily , eVisit, MDBox and more.
- Majority of these vendors would allow interfacing via SIU, DFT, ADT.

- Pricing is different with each vendor and you should review their volume pricing for your practice.

Best long-term approach: telemedicine solution provided by your EMR vendor

- Best workflow option is an integrated solution. Contact your EMR/PM vendor to check for availability.
- Alternative applications with a bi-directional interface between your EMR and Telemedicine platform are also recommended

Billing considerations

Telehealth visits
- Regular E&M and Consult visit codes apply
  - 99201-99205
  - 99211-99215
  - 99241-99245
- Modifier 95 can be added to indicate "Synchronous telemedicine service rendered via real-time interactive audio and video telecommunications system."
  - *"The totality of the communication of information exchanged between the physician or other qualified healthcare professional and the patient during the course of the synchronous telemedicine service must be of an amount and nature that would be sufficient to meet the key components and/or requirements of the same service when rendered via face-to-face interaction."*
- POS = 02 – Telehealth
- Reimbursement = In Office Rates
- Medicare coinsurance and deductible would generally apply to these services. However, the HHS Office of Inspector General is providing flexibility for healthcare providers to reduce or waive cost-sharing for telehealth visits paid by federal health programs.

Virtual check-in and e-visits
- For established patients you can also perform a virtual check-in or e-visit using a broad range of communication methods (patient portal, email, text, etc..). The reimbursement ($10-$20) is time based. For additional information please see https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet

Always check with commercial insurers directly for their reimbursement policies.

General setup considerations

1. Select the preferred videoconferencing vendor
2. Create the necessary accounts for the providers and staff members who will be servicing the patients remotely.
3. Walk your staff through setting up the videoconferencing application on their workstations or mobile devices. Ensure they have the necessary hardware and software setup. Audio or headset, built-in or attached camera or phone/tablet with camera. Video capabilities must be present for Telehealth visits.
4. Perform at least one test call to ensure proper setup.

General workflow considerations

1. Designate staff members to check schedules, call patients in advance and help them prepare for a videoconference with your designated platform.
2. Create the patient specific videoconference appointment in the vendor app and provide the patient with the specific link or meeting ID.
3. On the date of the visit a staff member:
   a. Initiates the videoconference through the patient specific meeting ID/link,
   b. Prepares the patient and chart in the EMR based on standard documentation guidelines,
   c. Notifies the physician to join the patient specific meeting ID/link when the patient is ready.
   The Physician then performs the visit and documents in the EMR based on standard documentation guidelines.
4. All scheduling, documentation and billing continues to be completed in the EHR/PM system. Ensure that the total time spent on the phone/video call with the patient is documented in the visit note.

![ChronWell logo]

What is zoom for healthcare:

Zoom for Healthcare is a scalable, cloud-based video telehealth service for healthcare organizations and providers. For more information visit https://memoq.zoom.us/docs/doc/Zoom%20for%20Healthcare.pdf

How do I subscribe to zoom for healthcare:

1) Go to https://zoom.us/healthcare

2) Click on Buy Now

3) Select the number of Hosts (you have to select 10 or more hosts)

4) Select add-on options if need it

   Access to webinars

   Audioconferencing

   Cloud recordings (recommended if you want to review encounters)

5) Choose if you want to pay monthly or yearly (yearly option includes a %16.66 discount)

6) Complete your personal information

7) Complete the payment information

Zoom has developed resources to assist during the **COVID-19** pandemic with daily demoes, training videos, and on-demand training sessions. You can find more information at https://zoom.us/docs/en-us/covid19.html

Most relevant videos to start using Zoom:

Getting started with Zoom (30 min):

https://livetraining.zoom.us/rec/play/ucYoIumtq243G9fAswSDUPArW9W-eKis1Cga8_EPmk7mAnFQMAevZ7IQZefBr9eLpOtBNxuUZZ4WFxrQ?continueMode=true

Zoom meetings training (6*0 min)*

https://livetraining.zoom.us/rec/play/ucYoIumtq243G9fAswSDUPArW9W-eKis1Cga8_EPmk7mAnFQMAevZ7IQZefBr9eLpOtBNxuUZZ4WFxrQ?continueMode=true

Zoom administration training (60 min):

https://livetraining.zoom.us/rec/play/751_Ju6rrGk3T9CVsQSDUKR7W9S1LK-s0CgZrvMEmh20WnZWMQGlZbsaNOPOzRphiIZngV-2kfvvNrPw?continueMode=true

Zoom for Telehealth includes the following features pre-configured:

- Cloud-based video, audio, and content sharing
- Support for desktop, mobile, and conference room systems
- End-to-end AES-256 bit encryption of all meeting data and instant messages
- Signed Business Associate Agreement* (BAA) to enable HIPAA compliance
- Waiting room for patient privacy enabled
- Platform API/SDK for integration with healthcare applications to streamline workflows
- Remote camera control enabled
- Integration with point-of-care peripherals

https://zoom.us/docs/doc/Zoom_for_Healthcare.pdf

Zoom HIPAA guide https://zoom.us/docs/doc/Zoom-hipaa.pdf

References

Latest CMS Fact Sheet
https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet

CodingIntel
https://codingintel.com/telemedicine-and-covid-19-faq/

CCHPCA
https://www.cchpca.org/sites/default/files/2020-03/CORONAVIRUS%20TELEHEALTH%20POLICY%20FACT%20SHEET%20MAR%2016%202020%203%20PM%20FINAL.pdf?utm_source=Telehealth+Enthusiasts&utm_campaign=a1c516ec33-EMAIL_CAMPAIGN_2020_03_16_10_31&utm_medium=email&utm_term=0_ae00b0e89a-a1c516ec33-353248693

AOA
https://www.aoa.org/Documents/Medicare%20COVID%2019%20Telehealth.pdf

About ChronWell

ChronWell reduces the cost of health care by driving efficiencies in Chronic Care Management (CCM) and Workers' Compensation. With two distinct verticals in specialty care and workers' compensation, ChronWell is redefining how value-based care is delivered to both Medicare beneficiaries who suffer from chronic conditions and workers injured at their job. Through empathy, modern technology, clinical staff, advanced analytics, multi-channel communications and tailored programs, ChronWell aims to improve patients' lives beyond the walls of the physician's office and minimize the impact of chronic conditions and workplace accidents on patients, employers, insurers and health care providers. For more information, follow us on Facebook, LinkedIn or visit www.chronwell.com.