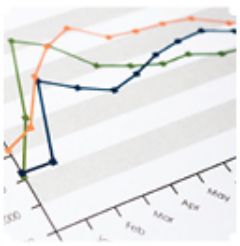# Telehealth

Overview and Updates for 2021

What is Telehealth?

- Includes a variety of tools and platforms allowing clinicians to connect with patients and other clinicians
  - **<u>Synchronous:</u>**
    - Real-time, audio/video communication connecting individuals in different locations
  - **<u>Asynchronous:</u>**
    - Store-and-forward technologies
    - Patient or clinician collects medical history, images, etc. and sends to a specialist for diagnostic or treatment advice
  - **<u>Remote patient-monitoring (RPM):</u>**
    - Technology that allows direct transmission of a patient's clinical data
    - BP monitors, Bluetooth scales, wearable devices w/ biometric data

Why is Telehealth important?

- Address health inequities
  - Access to primary care or preventive services
- Rural and underserved areas
  - Access to specialty care
  - Transportation barriers
- Patient engagement
  - Flexibility in how they receive care
  - Hybrid approach to improve care quality
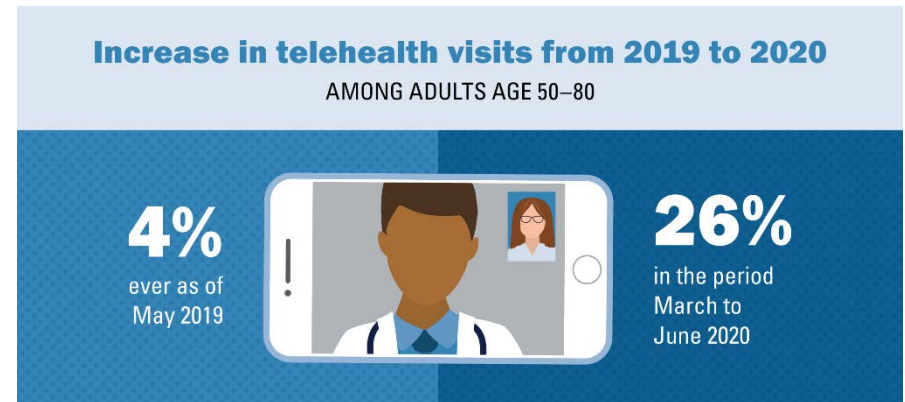
Telehealth and COVID-19
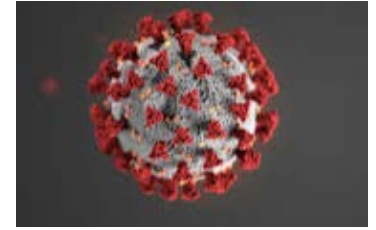
- Importance:
  - Allow patients continued access to care while minimizing contact
  - Allow clinic operations to continue
  - Adherence to public health regulations

- Potential Uses:
  - Triaging/screening for COVID-19 symptoms
  - Contact tracing
  - Monitoring symptoms
  - Specialty care for hospitalized patients

Telehealth Use

- REACH Healthcare Foundation survey (2017)
  - *37% hospitals, 70% PCPs and 90% of SNFs had **NO** telemedicine program*

- Article: Morbidity and Mortality Weekly Report *(MMWR)* - Trends in Use of Telehealth Among Health Centers During the COVID-19 Pandemic — United States, June 26–November 6, 2020
  - Demeke HB, Merali S, Marks S, et al. Trends in Use of Telehealth Among Health Centers During the COVID-19 Pandemic — United States, June 26–November 6, 2020. MMWR Morb Mortal Wkly Rep 2021;70:240–244. DOI: http://dx.doi.org/10.15585/mmwr.mm7007a3external icon.

  - Nearly 1/3 of health visits were conducted through telehealth
  - Health Center Program Data showed:
    - **43%** utilization among health centers in 2019 vs **95%** during the pandemic

Why did usage increase?

- **Need**
  - Access to care
  - Patient volume
- **Regulations**
  - Relaxed rules
  - Expanded coverage
    - Among facilities
    - Place of Service

Increase in telehealth visits from 2019 to 2020
AMONG ADULTS AGE 50–80

4%
ever as of
May 2019

26%
in the period
March to
June 2020

INSTITUTE FOR
HEALTHCARE POLICY
& INNOVATION
UNIVERSITY OF MICHIGAN

Poll: Telehealth visits
have skyrocketed…

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Medicare Telehealth Expansion

- March 6, 2020
  - Bill gives HHS secretary authority to waive key restrictions on telehealth coverage, *if* a public health emergency (PHE) is declared
  - March 13, 2020 – President declared COVID-19 emergency under Stafford Act
  - HHS Secretary declares PHE exists Jan. 27, 2020
    - Renewed every 90-days
    - https://www.phe.gov/emergency/news/healthactions/phe/Pages/default.aspx

Flexibility Goals

- Allow patients access to care from home

- Care by Phone

- Rapidly expand health care workforce

- Expand community resources

- Expand hospital capacity

- Patients over paperwork
  - Reduced administrative burden

What restrictions are waived?

- Physicians can provide telehealth to Medicare patients nationwide
  - Not just rural areas
- Audio-only visits covered
- Originating site requirement waived
  - Allows for home care
  - No onsite visit required
- Payment rates increases
  - In-person office rates (previously 30% less)
- Telehealth and RPM covered for new and established patients

Services added to Medicare List

- ED visits

- Observation care

- Admission and discharge
  - Hospitals
  - Nursing facilities

- Critical care

- Therapy services

- Home care….

List of Telehealth services for Calendar Year 2021

CMS.gov
Centers for Medicare & Medicaid Services

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Telehealth Billing Guidance

Involves video or pictures and real-time (synchronous)	• **99201-99205 or 99211-99215**
Virtual Check-in	• **G2012** – brief communication, technology-based • **G2010** – store and forward (asynchronous)
Audio communication only (telephone E&M visit)	• **99441 – 99443**
E-visit (online communication using patient portal)	• **99421 – 99423**

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Oklahoma Telehealth

- Oklahoma Health Care Authority
  - Adopted expanded use of telehealth beginning March 16, 2020
    - Continued during PHE
  - Must continue to meet requirements of OAC 317:30-3-27
- Participation requirements:
  - Contracted with SoonerCare and appropriately licensed
  - Bill using GT modifier
    - *Indicates use of synchronous telecommunication*
  - Documentation of services
  - Out-of-state providers may participate
  - Members may receive services outside of OK
  - Activities must comply with HIPAA Security Rule, OHCA policy, and other applicable state and fed laws and regulations

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OKLAHOMA
Health Care Authority

Notification of Enforcement Discretion

- **Office of Civil Rights (OCR)** is responsible for enforcement of HIPAA regulations
  - Amended under HITECH Act to protect privacy and security of PHI
- **Discretion during COVID-19**
  - OCR will not impose penalties for noncompliance
  - Providers should **exercise professional judgement**
  - Care can be COVID-19 related or non-COVID-19 related
  - Good faith provision of telehealth

Enforcement Discretion

- Applies to audio or video communication during PHE
  - *Non-public facing remote communication*
- Allows for popular video communication apps
  - Apple FaceTime, Skype, Zoom…
  - Under this notice Social media applications should be avoided (Facebook live, Twitch, TikTok)
- Where can you conduct telehealth?
  - Ideally within a clinic, office or other private setting
  - Use reasonable HIPAA safeguards to protect PHI

HIPPA Compliant Options???

- There are vendors that offer HIPAA-compliant options
  - Check with IT staff or consultant on software options
  - Review/implement business associate agreement (BAA)
  - Make patients aware of cybersecurity risks
- Do you currently have policies and procedures in place???
  - Document!!!
    - Services provided, location of services, technology used, processes for connecting and communicating with patients

Motivations for Attacks

Large Volume of Electronic Data

Wide Array of Technology and Entry Points

Lots of Connectivity and Web Available Data

Easy Target

Historical Attacks Working

Healthcare Industry is Slow to Address Risks

FINANCIALLY BENEFICIAL

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Value Indicators

Social Security Numbers, Debit/Credit Numbers - $1.00

Login Information to Websites Often Sold in Bulk - $20-$200

Driver License Numbers - $20

Medical Records - $250-$1000

Provider Credentials - $500

Free Health Care Services - $$$$$

Cybersecurity Risks

Healthcare Lost $25 billion to Cyber Security

15% of All Breaches are Healthcare Related

Email is the Most Common Entry Point for Attacks

Average cost of healthcare breach is $1.4 million

OCR reports Breach Increase of 196% from 2018-2019

41 Million Patient Records Breached in 2019

Analyze Risk

Identify

- Device Inventory
- Software Inventory
- External Sites and Resources
- Staff Workflow
- Applications, Passwords, and Other Critical Resources

Evaluate

- Threats & Vulnerabilities
- How Resources are Used
- Staff Activities and Technology

Thorough

- Examine New Technology
- Examine Changes in Environment
- Develop Strategies for Continuous Monitoring and Evaluation

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Utilize Appropriate Technology

Network Security

- Next Generation Firewalls
- Network Intrusion and Prevention
- Web Content Filtering
- Network Segmentation
- Patch Management

Server Security

- Security Policies
- OS Hardening
- Software Firewalls
- A/V
- Patch Management
- Encryption

Client Security

- Security Group Policies
- Next Generation Antivirus
- Software Firewalls
- Limited Browsers
- Application Management
- Patch Management
- Mobile Device Management
- Encryption

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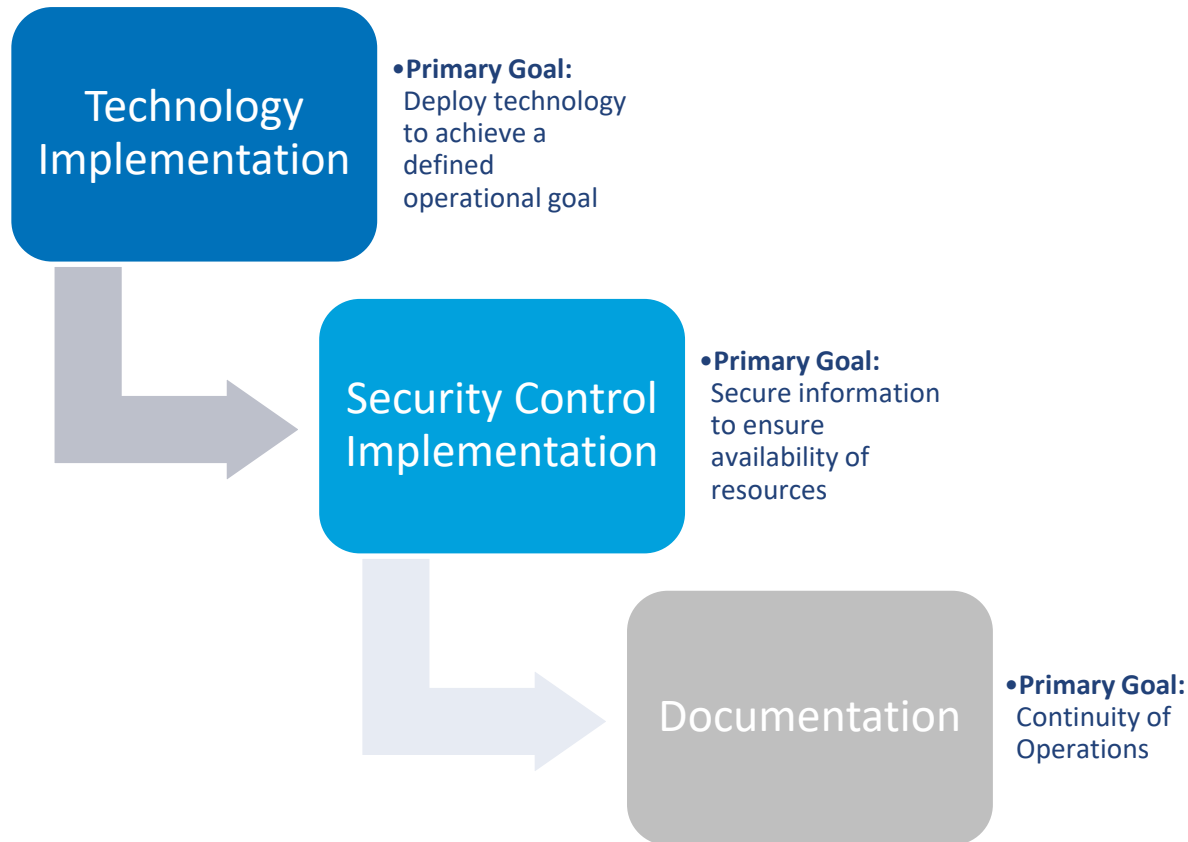ADVANCING QUALITY • IMPROVING LIVES

Security Program – Textbook Model

Security Program - Gaps

Program Designed for Operational Efficiency NOT Security

Controls in place with minimal security planning

Lacking Documentation

Lacking Consistent Workflow Procedures

Lacking IT/Physical Security Configurations

Lacking Sufficient Auditing

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Security Program – Reality

Technology Implementation

- **Primary Goal:** Deploy technology to achieve a defined operational goal

Security Control Implementation

- **Primary Goal:** Secure information to ensure availability of resources

Documentation

- **Primary Goal:** Continuity of Operations

Local Telehealth Resources

- Heartland Telehealth Resource Center
  - http://heartlandtrc.org/
- Telehealth Alliance of Oklahoma
  - https://taoklahoma.org/
- Oklahoma Office of Rural Health
  - https://medicine.okstate.edu/rural-health/office-of-rural-health.html

Funding Programs

- Sustainability
  - Broadband expansion programs
  - Technology reimbursement
  - Distance learning expansion

Community Facilities Program

Distance Learning and Telemedicine Program

Health Care Connect Fund

QUESTIONS???

We Are Here To Help!

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jfelts@ofmq.com
Call: (877) 963-6744
Visit: www.OFMQ.com