

### Medicaid Telehealth Permanent Policies October 8, 2021



## **CENTER FOR CONNECTED HEALTH POLICY (CCHP)**

is a non-profit, non-partisan organization that seeks to advance state and national telehealth policy to promote

improvements in health systems and greater health equity.

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# **ABOUT CCHP**

- Established in 2009 as a program under the Public Health Institute
- Became federally designated national telehealth policy resource center in 2012 through a grant from HRSA
- Work with a variety of funders and partners on the state and federal levels
- Administrator National Consortium of Telehealth Resource Centers
- Convener for California Telehealth Policy Coalition







# NATIONAL CONSORTIUM OF TRCS

#### TelehealthResourceCenter.org







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Image source: American Psychological Association

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# **Today's Webinar**



Lori Coyner, MA Senior Medicaid Policy Advisor Oregon Health Authority

> Shannon Dowler, MD Chief Medical Officer North Carolina Medicaid Department of Health and Human Services



Sara Salek, MD Chief Medical Officer Arizona Health Care Cost Containment System



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# Telehealth in Oregon: the evolving Medicaid policy landscape

**Center for Connected Health Policy** 

October 8, 2021

Lori Coyner, Senior Medicaid Policy Advisor





Overview of Oregon Health Plan and Oregon Health Authority

Telehealth current state, opportunities, and risks

**OHA Telehealth Policy Framework** 

Oregon Medicaid policy landscape



# Oregon Health Plan provides coverage for one million Oregonians

OHP provides:

Physical, oral, and behavioral health care

For about one million Oregonians

Of which 41% are children

OHP includes:

Medicaid

Children's Health Insurance Program (CHIP)

Cover All Kids

Reproductive Health Equity Act (RHEA)

Other related services





# **Oregon Health Authority's (OHA) strategic goal is to eliminate health inequities in Oregon by 2030**

#### Health equity defined:

Oregon will have established a health system that creates health equity when all people can reach their full health potential and well-being and are not disadvantaged by their race, ethnicity, language, disability, gender, gender identity, sexual orientation, social class, intersections among these communities or identities, or other socially determined circumstances.

Achieving health equity requires the ongoing collaboration of all regions and sectors of the state, including tribal governments to address:

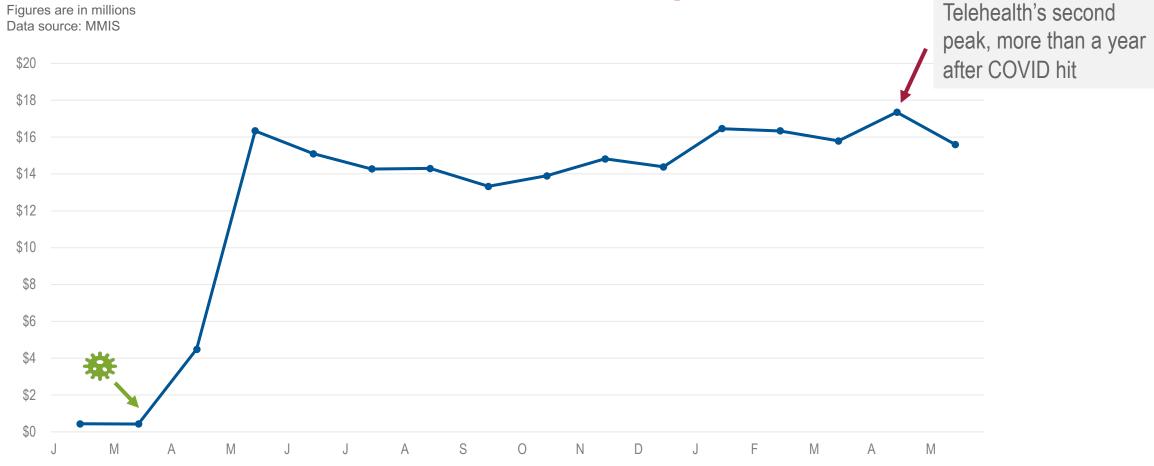
The equitable distribution or redistribution of resources and power; and

Recognizing, reconciling and rectifying historical and contemporary injustices.

# **Telehealth in Oregon**

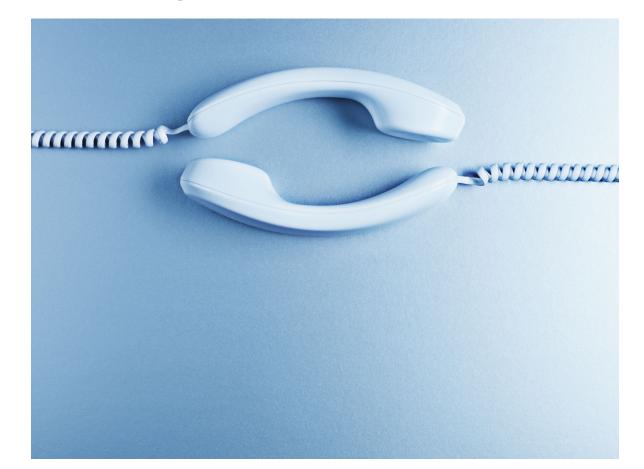
Current state, opportunities and risks

# Telehealth use increased dramatically early in the pandemic, and remains high



\*Note: Data reflect claims and encounters submitted to OHA as of 08/03/2021. Data may be incomplete, especially for the most recent month

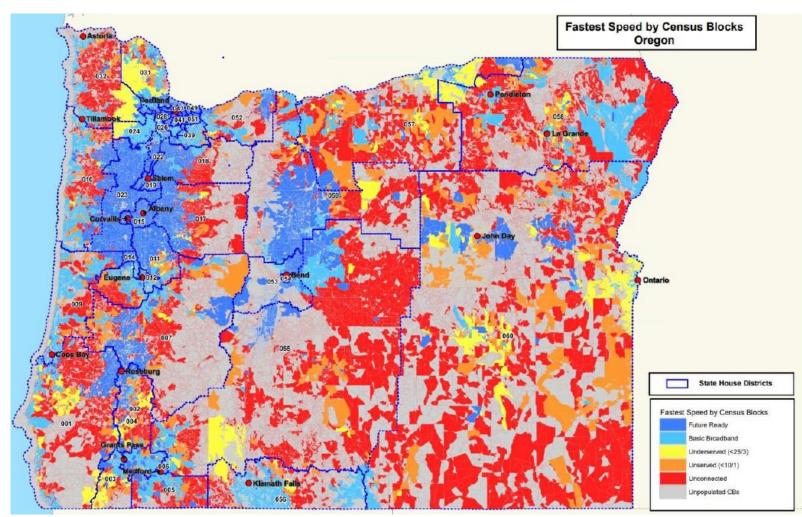
# About 40% of telehealth visits in Oregon Medicaid occur by audio-only telephone\*



\*Data source: MMIS. Note – this data includes only audio-visual and audio visits (e.g. does not include other types of telehealth such as e-visits, store and forward, remote patient monitoring). No audits have been performed on this data.



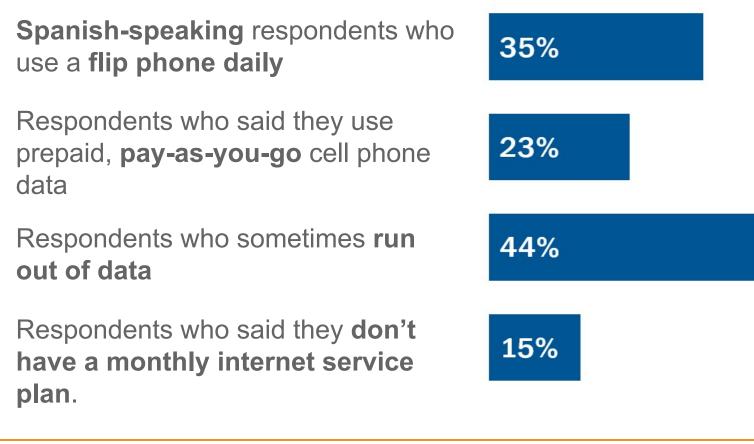
# 95% of Oregonians live in areas with basic broadband, but the distribution reflects the urban/rural divide



Source: Oregon Broadband Advisory Council 2020 Report <u>https://www.oregon4biz.com/Broadband-</u> Office/OBAC/Reports/BroadbandRpt2020.pdf

# In a recent survey of Oregon WIC participants, the data reflects inequities

**90%** of those surveyed have a smart phone and use it daily, but...





<sup>15</sup> Source: Oregon telehealth readiness study, Oregon WIC Program, OHA Public Health Division

## Telehealth has the potential to exacerbate health inequities if opportunities aren't realized and risks aren't avoided



- Culturally and linguistically responsive care
- In-home care and communitybased services

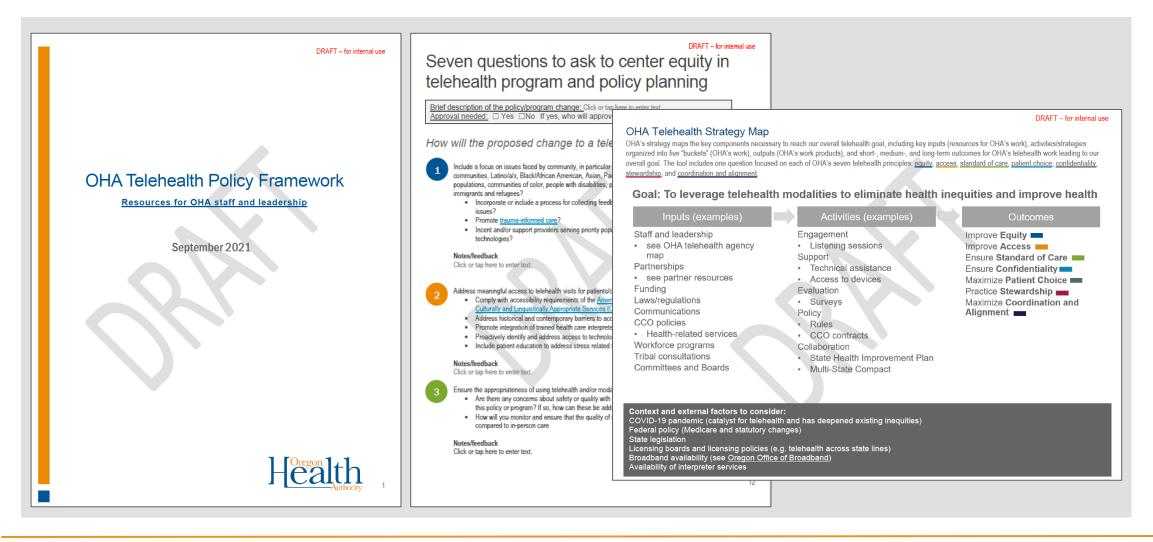




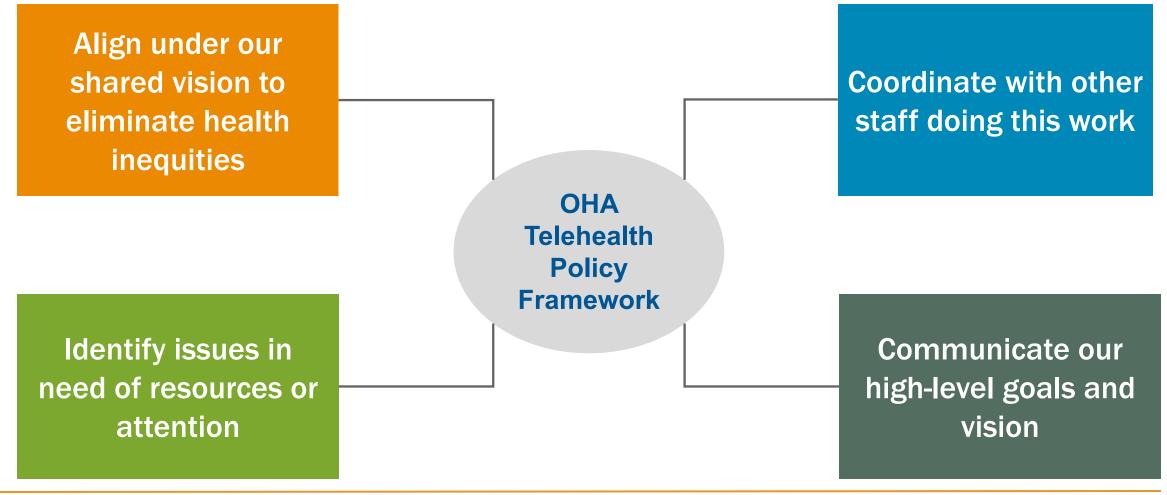
Decreased access to in-person visits

# **OHA Telehealth Policy Framework**

# OHA's Telehealth Policy Framework is an internal resource to guide program and policy work



## OHA developed the Telehealth Policy Framework to improve cross-agency alignment, coordination, issue identification, and communication



## Framework excerpt: Telehealth Strategy Map

OHA Telehealth Goal: to leverage telehealth modalities to eliminate health inequities and improve health

#### Inputs (examples)

Staff and leadership Partnerships Funding Laws/regulations Communications CCO structure and policies Workforce programs Tribal consultations Committees and Boards

#### Activities (examples)

Engagement

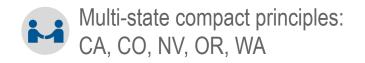
- Listening sessions
  Support
- Technical assistance
- Access to devices
- Evaluation
- SurveysPolicy
- Rules
- CCO contracts

Collaboration

- State Health Improvement
  Plan
- Multi-State Compact

#### Outcomes

- Improve Equity
  Improve Access
- Ensure **Standard of Care** Ensure **Confidentiality** Maximize **Patient Choice**
- Practice Stewardship
  Maximize Coordination and Alignment



# Framework excerpt: Seven questions to center equity in our telehealth policy and program planning

How will the proposed change to a telehealth policy or program...

- 1 Focus on issues faced by community, in particular communities of color and tribal communities?
- 2 Address meaningful access to telehealth visits for patients/clients/members, in particular priority populations?
- 3 Ensure the appropriateness of using telehealth and/or modality (e.g. video call) for services being delivered?
- 4
- Protect privacy of visit and personal information?
- 5 Incorporate strategies to ensure patient choice of modality, including preference for in-person services?
- 6 Prioritize equitable access to services given any resource constraints and cost containment goals?
- **7** Support alignment with other efforts within OHA and by external partners?

# **Oregon Medicaid Policy Landscape**

## Medicaid policies as of January 2021

No restrictions on distant or originating sites

Telehealth allowed for new and established patients

Pay parity for telehealth and in-person (interpreters must be paid at parity)

• Audio-only requires modifier, and use if A/V not available or feasible

Patient consent required

Providers ensure meaningful access



## **Recent telehealth legislation passed in Oregon makes permanent many COVID-19 expansions**

### House Bill 2508

Expands coverage of and pay parity for telemedicine services in Oregon

Applies to commercial plans and Medicaid

Audio-only included

### House Bill 2591

Funds three telehealth pilot projects for school-based health centers

School-based health center is the distant site that provides telehealth in conjunction with school nurse located at the originating site



## **Proposed Medicaid rule changes for 2022 focus on patient choice**

Strengthen patient choice and options

Meaningful access considerations

**Consent requirements** 



## **Thank You**







**NC Department of Health and Human Services** 

## **Should it Stay or Should it Go?** The Clash of Telehealth Post Pandemic

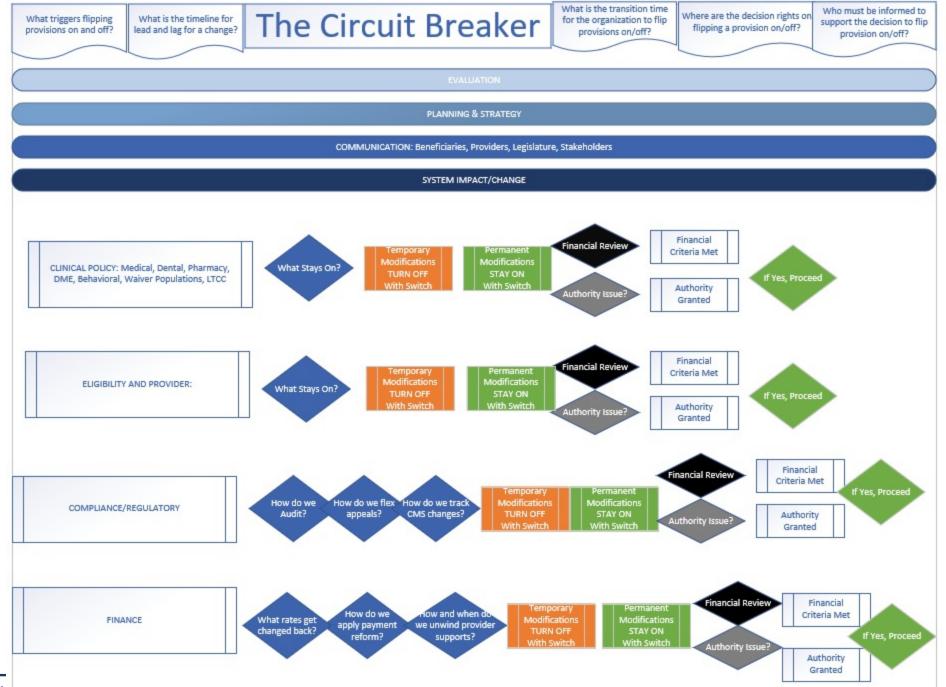
Shannon Dowler, MD Chief Medical Officer NC Medicaid

October 2021

## **Object (Telehealth) Permanence**

- What did we consider?
- How did we make our decisions?
- What did we learn?
- Where did we struggle?
- What was unique?
- What is next?





#### **Circuit Breaker Recommendations: Final Outcome**

The Department analyzed 387 flexibilities across multiple functional areas. The summary tables below provide insight into the final recommendations.

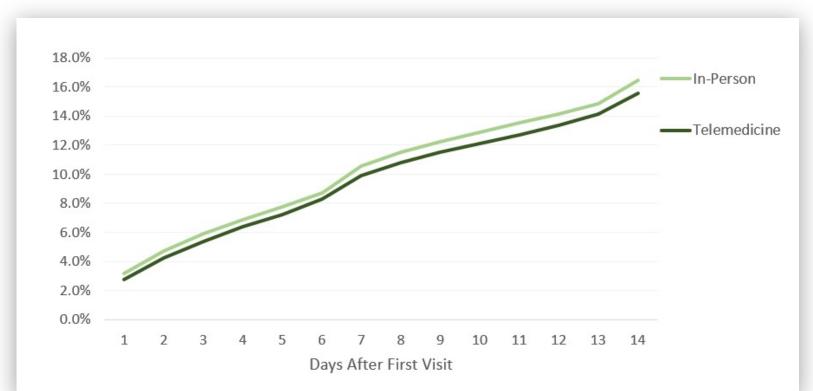
Workstream Recommendations	#	%
Benefits	133	34%
Recommended Keep	15	4%
Recommend keep with changes	38	10%
Consider Keep	4	1%
Recommend to not keep	67	17%
Not reviewed through CB	9	2%
Finance and Rate Setting	23	6%
Recommended Keep	6	2%
Recommend keep with changes	3	1%
Recommend to not keep	14	4%
LME-MCO	202	52%
Recommended Keep	18	5%
Recommend keep with changes	23	6%
Recommend to not keep	161	42%
Member Services	9	2%
Recommend to not keep	9	2%
Pharmacy	9	2%
Recommended Keep	2	1%
Recommend to not keep	7	2%
Provider Operations	7	2%
Recommend to not keep	7	2%
Command Center	2	1%
Recommend keep with changes	2	1%
Contact Center	1	0.3%
Recommended Keep	1	0.3%
Grand Total	387	100%

30

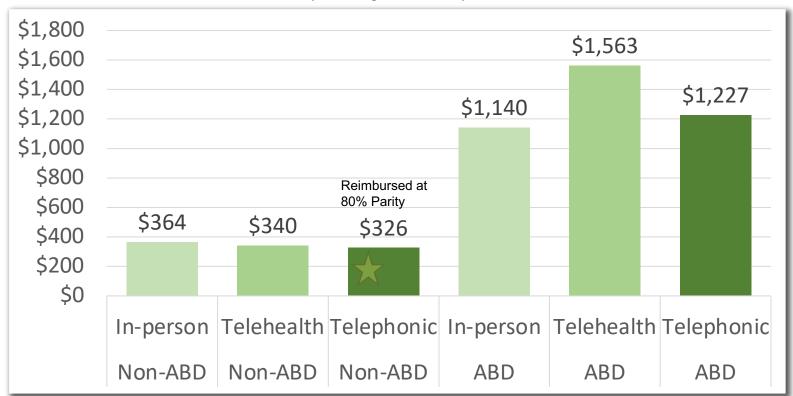


Our early "prediction models" for cost of telehealth grossly overestimated fiscal impact .

#### A Second Visit Was Less Likely After Teleservices



#### **Total Cost of Care in Two Weeks Following Primary Care Visit**



Service Dates (allowing for runout): 3/01/2020 - 3/15/2021



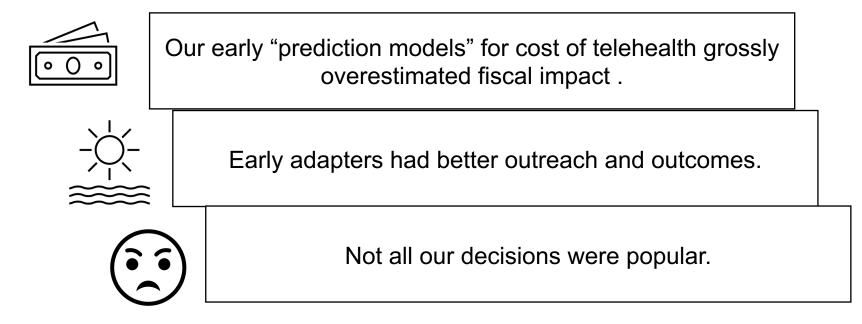
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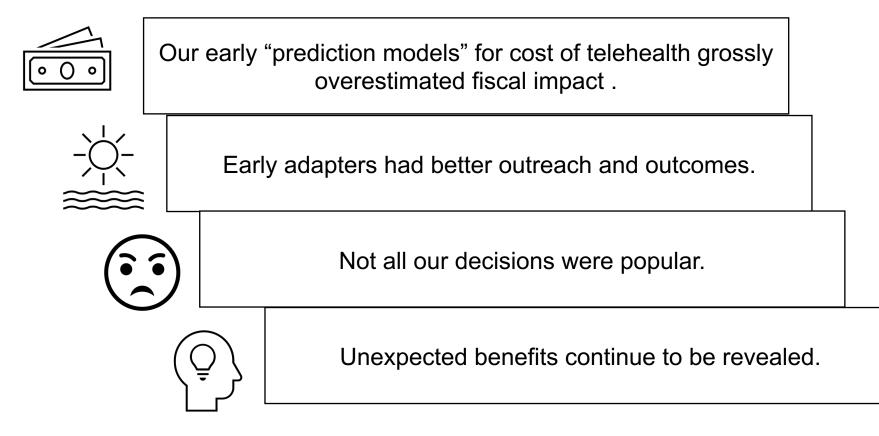
Early adapters had better outreach and outcomes.

### **Using Teleservices to Close Care Gap**

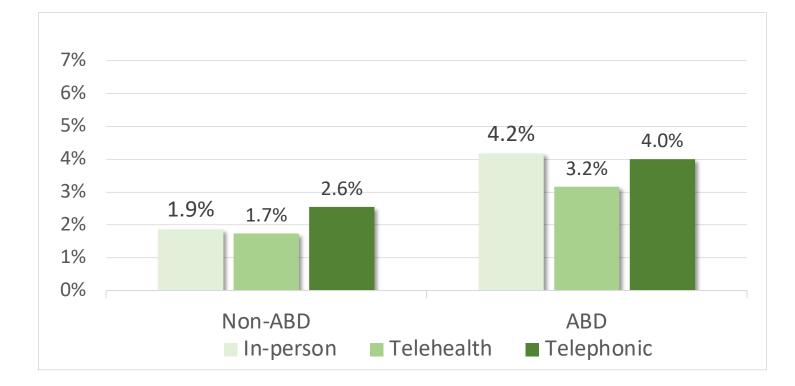
Level of Uptake (number of teleservice claims during the pandemic so far)	No. of Practices	No. of Patients Receiving Primary Care During Pandemic	
HIGH (300+)	308	853,392	121%
MED (50-299)	567	431,825	97%
LOW (1-49)	875	315,133	77%
NONE	488	109,272	80%
Grand Total	2,238	1,709,622	101%



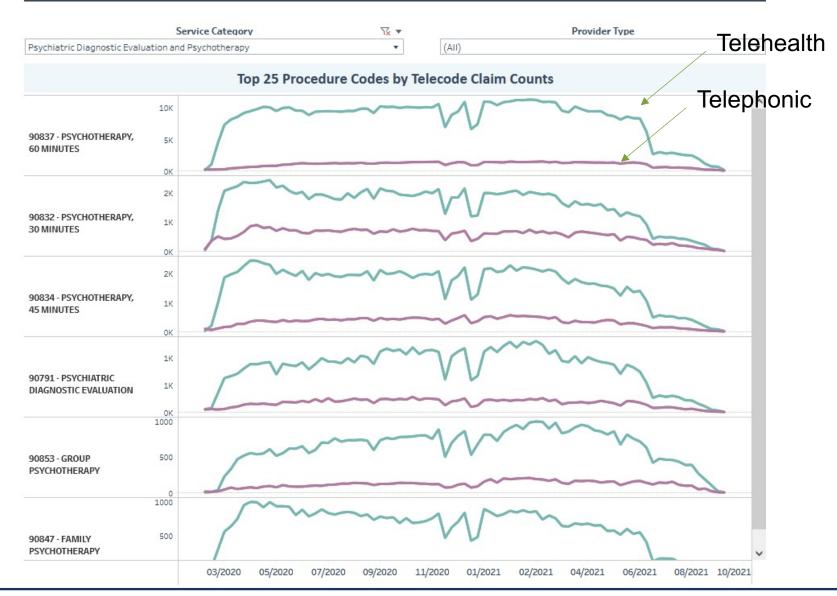
# (No Further Explanation Required)



#### % Using Hospital Within Two Weeks of Primary Care Visit

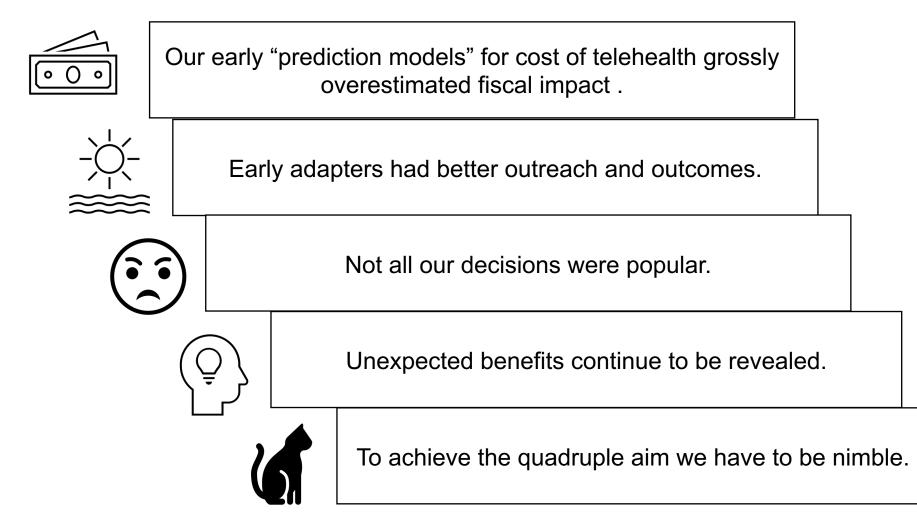




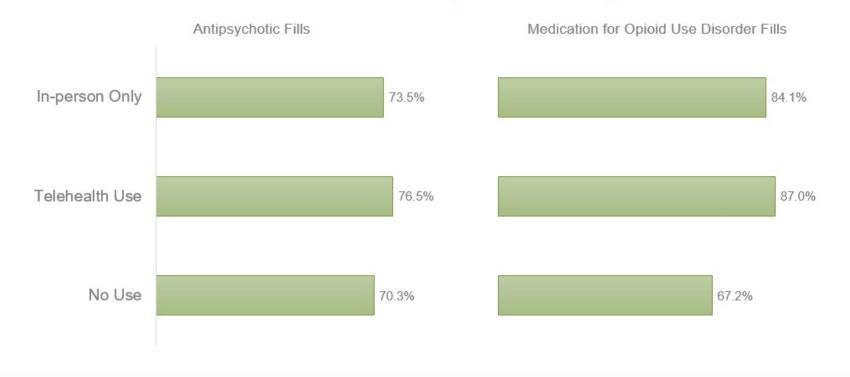


NCDHHS, Division Health Benefits | Should it Stay or Should it Go| October 2021

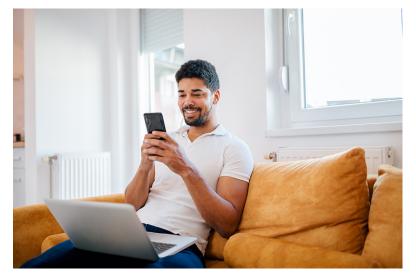
#### What did we learn?



#### Probability of medication use between June 2020-January 2021 was higher for beneficiaries that received some services during March 2020 – May 2020



### Where did we struggle on permanence?



**Telephonic Only Services** 



Specialized Therapies, Audiology, Optometry







### **Telephonic Only**

#### **NEGATIVES**

#### POSITIVES

- When all else fails, it may be your only way to reach a patient.
- It is more convenient for provider and patient.

More people have phones and minutes than don't (there are "cellular" deserts, but they are not as big as "broadband" deserts)

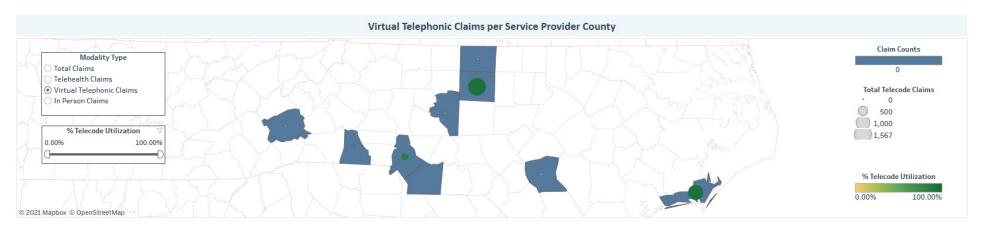
• For low income and low health literacy this is more accessible.

- Cost to provide the service(by a practice) MUCH lower.
- Value of the care provided lower.
- Risk of inappropriate clinical care is higher.
- Risk of fraud/abuse is higher.
- Risk of HIPAA noncompliance is higher.
- Potential to exacerbate inequities exists:
- ~failure to improve on technology gaps
- ~potential to prioritize lower value care



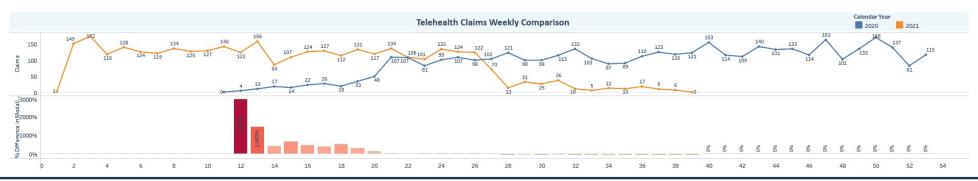
#### Example: Telephonic Billing Audiology

NC Medicaid ( Telecode Utili



NC Medicaid Telecode Utilization

#### Example: Telephonic Tobacco Cessation

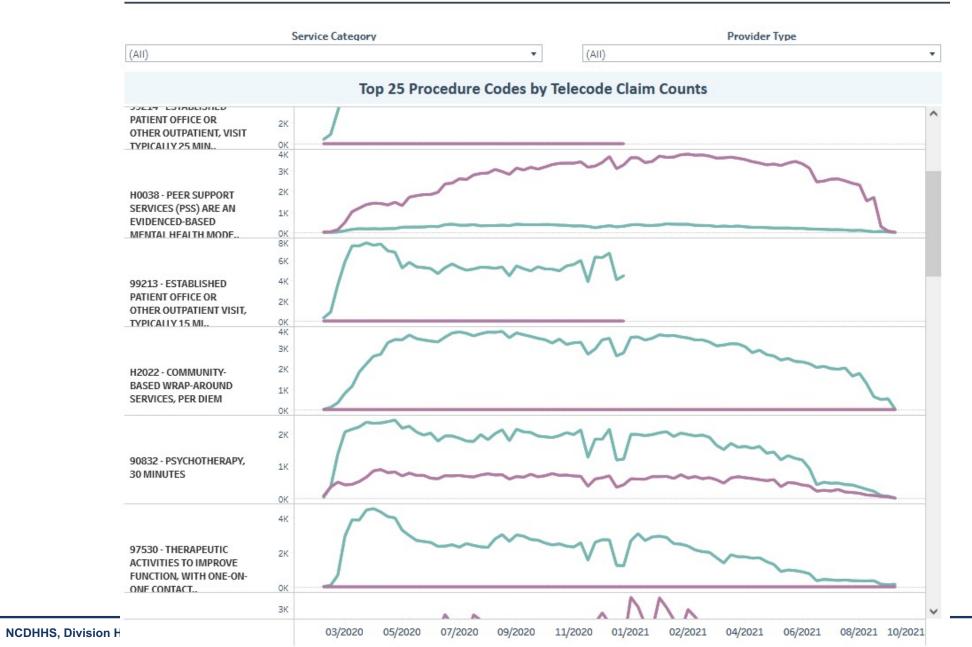


NCDHHS, Division Health Benefits | Should it Stay or Should it Go| October 2021









#### **Specialized Therapies**

#### Positives

- Parents more engaged and active in therapy
- When care provided through school typically, engaging parents in home a plus
- Number of visits ultimately reduced due to parent engagement(anecdotal)
- Increases access to specialty providers for rural beneficiaries
- ST would not have been on our radar for telehealth modernization if not for the pandemic
- Allows therapists to look at patients function in their home environment
- Therapy sessions more efficient because no "warm up" orientation time in home environment
- Ease of scheduling and making up visits; more flexible hours to work in
- Teletherapy resources available for patient education(software/packages) virtually

Telephonic only services used more than anticipated and in patterns that were concerning

**Negative** 

Lack of data to support from larger studies or pilots; emerging

Not every child/family is able to use this modality effectively (screen distraction)

Lack of access to appropriate technology resources, access, literacy

Some modalities need hands-on care

Safety concerns in home environment for some modalities(has screening been adequate)

Employers directing providers to meet productivity goals using this modality







### **Virtual Wellness Visits**

#### POSITIVE

- Allows immune compromised members/families easier and safer access to care.
- Convenience for family.
- Reduces transportation burden on physically disabled members.



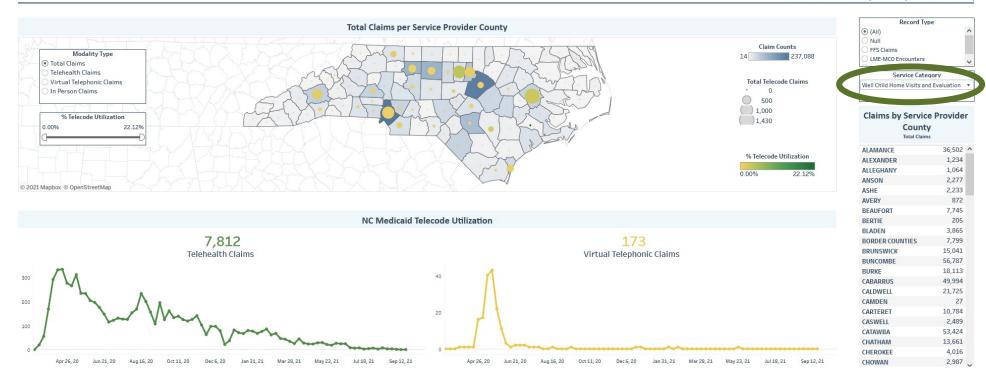
#### NEGATIVE

- Often visits involve need for a physical exam component, especially in younger beneficiaries.
- Frequently involves labs or immunizations.
- Need to track growth and vital signs accurately.
  - Creates increased program cost with double visit.

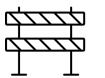
#### Well Child Visits: Telehealth/Telephonic



NC Medicaid COVID-19 Monitoring Telecode Utilization by Modality - Provider County



### What are some unique accomplishments?



Removing Barriers that contribute to health inequities



Early Prenatal Care and Risk Screen



Virtual Lactation Consultation



Virtual Ventilator Management

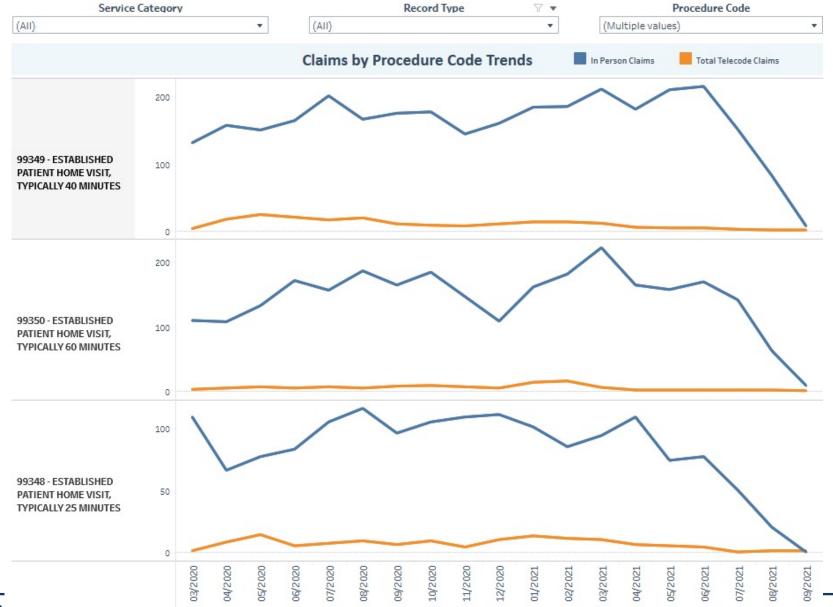


Hybrid Home-Telehealth Visit





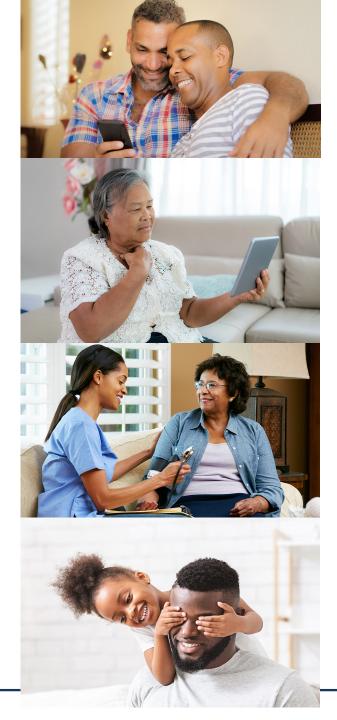
#### Build It and They (may or may not) Come



NCDHHS, Division Health

#### **Description of Temporary Flexibility Made Permanent**

- 1A-24: Diabetes Self-Management Education
- 1-I: Dietary Evaluation and Counseling and Medical Lactation Services
- 1-M3: Health and Behavior Intervention
- 1E-7: Family Planning Services
- 1M-2: Childbirth Education
- 1A-34: Dialysis Services
- 1E-6: Pregnancy Medical Home
- 8-J: Children's Developmental Service Agencies (CDSAs)
- 8G: Peer Supports
- 8A: Enhanced Mental Health and Substance Abuse Services
- 8A-2: Facility Based Crisis Services
- 9: Outpatient Pharmacy
- 8C: Outpatient Behavioral Health Services Provided by Direct-Enrolled Providers
- 3A: Home Health Services
- 3G-1: Private Duty Nursing for Beneficiaries Age 21 and Older
- 3G-2: Private Duty Nursing for Beneficiaries Under 21 Years of Age
- 3D: Hospice Care
- 3H-1: Home Infusion Therapy
- 10C: Local Education Agencies (LEAs)
- 10D:L Respiratory Therapy Services
- 5A-2: Respiratory Equipment
- 5A-3: Nursing Equipment and Supplies
- 8E: Intermediate Care Facilities for Individuals with Intellectual Disabilities
- 8F: Research-based Behavioral Health Treatment for Autism Spectrum Disorder
- 8P: NC Innovations
- 4A: Dental Services
- 4B: Orthodontic Services
- 1E-5: Obstetrical Services
- 1D-4: Cor Services Provided in Federally Qualified Health Centers and Rural Health Clinics



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Family Doc, Healthcare Executive, Rapper, Writer, STD Specialist, Advocate. #WomenInMedicine #STD #ThisIsOurLane #publichealth #healthequity #sexualhealth



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#### Dr.DowlerNCMedicaid @DShannondowler

Excited to be Chief Medical Officer of NC Medicaid @ncdhhs Family Doctor @myncafp @aafp Lover of Rhyme, Mom, Wife, Speaker, Writer, Standard disclaimers apply.

Videos



Off to the STD STD Clinic You Go 2015 Old

STD's Never Get American Academy Old of Family Physicians (AAFP) - AAFP Member Monday: Dr. ... Shannon Dowler,MD YouTube - Mar 5, 2017 Facebook - Apr 10, 2017

W UNAVAILABL

#### Shannon Dowler,MD - YouTube https://www.youtube.com > channel -

Shannon Dowler.MD

YouTube - Feb 20, 2015

Shannon Dowler,MD uploaded a video 2 years ago. 4:29. Play next; Play ... Shannon Dowler,MD uploaded, posted and liked 4 years ago. Celebrating 50 years ...

Shannon Dowler, MD, FAAFP, CPE Chief Medical Officer NC Medicaid Division of Health Benefits N.C. Department of Health and Human Services

(Office) 919-527-7028 (Cell) 919-906-5778 (Fax) 919-832-0225 <u>shannon.dowler@dhhs.nc.gov</u>

#### COMING SOON: STI's Never Get Old





accept failure w re sil i ence nn. [U] quality recovering the tion after being



# Arizona Medicaid Permanent Telehealth Policy Changes

## Dr. Sara Salek Chief Medical Officer, AHCCCS



## AHCCCS At A Glance



Largest insurer in AZ, covering over 2 million individuals and families...



AHCCCS uses federal, state and county funds to provide health care coverage to the state's Medicaid population.



...more than 50% of all births in AZ...



More than 106,566 health care providers are registered with AHCCCS.



...and two-thirds of nursing facility days.



Payments are made to 15 contracted health plans that are responsible for the delivery of care to members.



### Arizona Medicaid Telehealth Coverage Pre-Pandemic Telehealth Policy Changes (October 1, 2019)

 Broadening of POS allowable for distant and originating sites

No restrictions on distant site (where provider is located) Broadening of originating site (where member is located) to include home for many service codes



Broadening of coverage for telemedicine, remote patient monitoring, and asynchronous

No rural vs. urban limitations



MCOs retained their ability to manage network and leverage telehealth strategies as they determine appropriate



Arizona Medicaid Telehealth Coverage Pre-Pandemic (October 1, 2019)





### Pre 10/1/19

Real-time telemedicine limited to 17 disciplines

### Implemented 10/1/19

No restrictions on disciplines



Arizona Medicaid Telehealth Coverage Pre-Pandemic (October 1, 2019)





Asynchronous covered in very limited circumstances

Dermatology Radiology Ophthalmology Pathology Neurology Cardiology Behavioral Health Infectious Disease Allergy/Immunology



Arizona Medicaid Telehealth Coverage Pre-Pandemic (October 1, 2019)





# Pre 10/1/19

# Implemented 10/1/19

Telemonitoring limited to CHF

No restrictions on telemonitoring

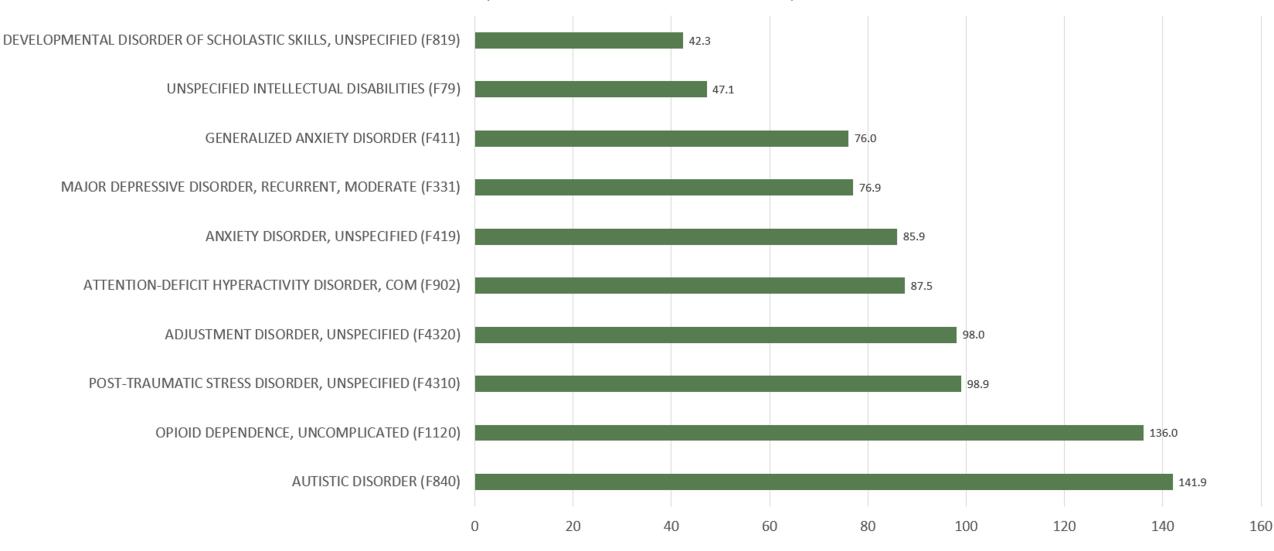


Arizona Medicaid Telehealth Coverage Intra-Pandemic (March 2020-Current)

- Created temporary audio-only code set (94 codes)
- Added >150 CPT and HCPCS codes for services delivered via audio-visual and store and forward
- Health plan requirements (not in effect prior to pandemic)
  - Reimburse at the same rate for services provided in-person and services provided audio-only
  - Cover all contracted services via telehealth modalities, including audio-only



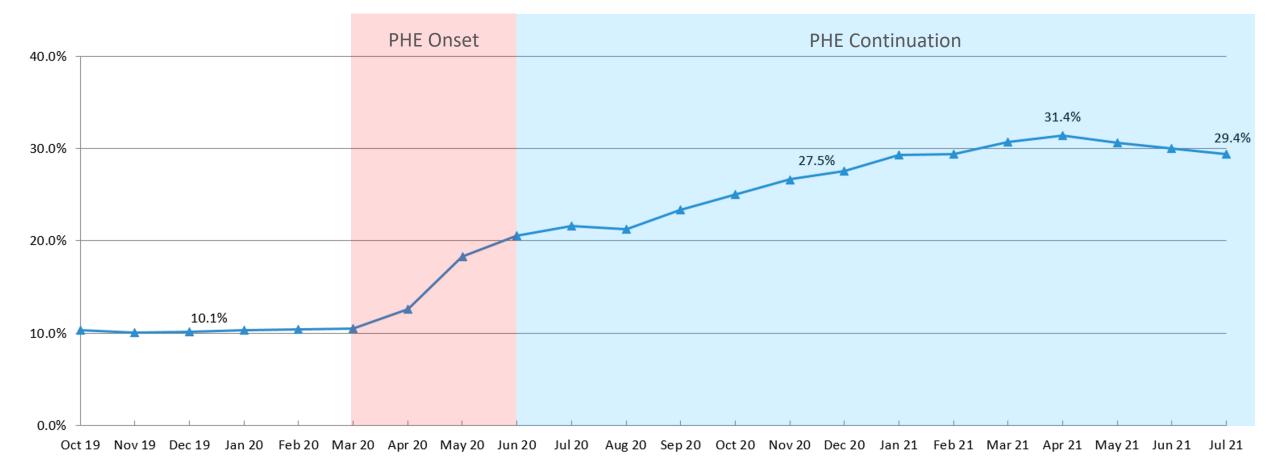
Calendar Year 2020 Telehealth Utilization of AHCCCS Members Most Common Primary Diagnoses Treated (CRN Count Per 1,000 Enrolled Members)





### Telehealth Utilization October 2019 - July 2021

Percentage of enrolled members with one or more telehealth service (rolling 12 month data per month)



Note: Includes real-time audio/visual services, our permanent telephonic services and the expansion of telephonic services in response to the public health emergency.



## AHCCCS Telehealth Coverage Summary

WHAT	TECHNOLOGY	TELEHEALTH MODIFIER <sup>1</sup> OR APPLICABLE DENTAL CODE	PLACE OF SERVICE (POS)	CODE SET AVAILABLE	CODE SET AVAILABLE AFTER COVID 19 EMERGENCY
Telemedicine (Synchronous)	Interactive Audio + Video	GT	Originating Site <sup>2</sup>	Telehealth Code Set	YES
Asynchronous (Store+Forward)	Transmission of recorded health history through a secure electronic communications system	GQ	Originating Site <sup>2</sup>	Telehealth Code Set	YES
Remote Patient Monitoring	Synchronous (real-time) or asynchronous (store and forward)	GT-Synchronous GQ-Asynchronous	Originating Site <sup>2</sup>	Telehealth Code Set	YES
Teledentistry	Synchronous (real-time) or asynchronous (store and forward)	D9995-Synchronous D9996-Asynchronous	Originating Site <sup>2</sup>	Teledentistry Code Set	YES
Telephonic	Audio	None	02-Telehealth	Telehealth Code Set	YES
Telephonic (Temporary)	Audio	UD	Originating Site <sup>2</sup>	Telehealth Code Set	NO <sup>3</sup>

1 All other applicable modifiers apply

2 Location of the AHCCCS member at the time the service is being furnished via telehealth or where the asynchronous service originates

3 Telehealth Advisory Committee voted on permanent audio-only code set at October 17, 2021 meeting



# House Bill 2454

## 36-3607: Telehealth Advisory Committee

- Requires adoption of telehealth best practice guidelines
- Requires recommendations regarding the health care services that may be appropriately provided through an audio-only telehealth format
- Requires the Advisory Committee, before making its recommendations, to:
  - 1. Analyze medical literature and national practice guidelines;
  - 2. Consider the comparative effectiveness, safely and benefit to the patient of performing a service through an audio-only telehealth format instead of in person or through an audio-visual format; and
  - 3. Consider the appropriate frequency and duration of audio-only telehealth encounters.



# Telehealth Advisory Committee Audio-only coverage post pandemic

Total of **37 codes** recommended for audio-only coverage post pandemic

- Maintain 24 codes (out of 94) on temporary audio-only code set
- Maintain 13 codes on permanent audio-only code list



# Arizona Medicaid Telehealth Coverage: Post-Pandemic Highlights

- Member access to care
  - Broadband and other technology access
- Member satisfaction
  - Consumer Assessment of Healthcare Providers and Systems (CAHPS) with supplemental questions for telehealth (results anticipated in late Fall 2021)



# Arizona Medicaid Telehealth Coverage: Post-Pandemic Highlights

- Code coverage decisions
- Reimbursement rates
- Network Standards
  - Appointment availability
  - $_{\circ}$   $\,$  Time and distance
- Telehealth practice guideline adoption
- Ongoing quality monitoring



## Arizona Telehealth Resources

- AHCCCS Telehealth Webpage
- <u>COVID Telehealth FAQs</u>
- AHCCCS Contractor Operations Manual (ACOM)
  - Network Standards
  - Appointment availability standards
- <u>Telehealth Advisory Committee</u>
- Arizona Telemedicine Program
- Southwest Telehealth Resource Center

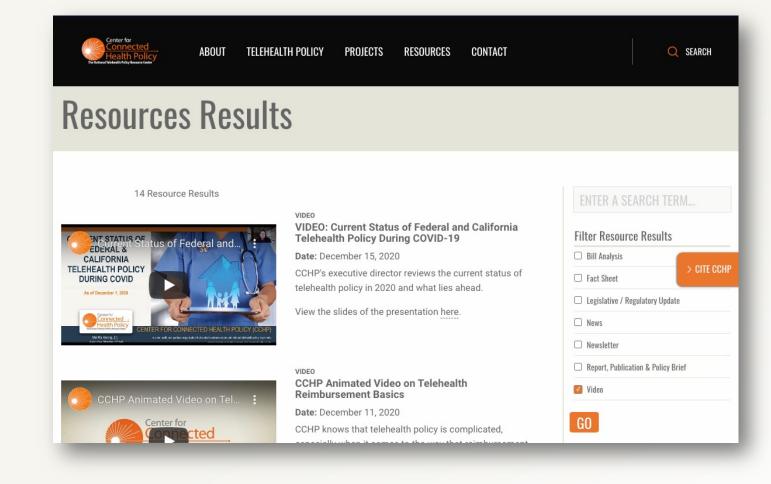


# Panel Q&A

Please submit questions using the Q&A function.



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# **THANK YOU!**



Lori Coyner, MA Senior Medicaid Policy Advisor Oregon Health Authority

> Shannon Dowler, MD Chief Medical Officer North Carolina Medicaid Department of Health and Human Services





Sara Salek, MD Chief Medical Officer Arizona Health Care Cost Containment System



# **EVALUATION FORM**

# Please don't forget to fill out your evaluation form!

# Thank you and have a great day!

