



# Telemedicine Policy

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# Alabama Medicaid Telemedicine

- Nothing to disclose
  - I have no proprietary, financial, or other personal interest of any nature or kind in any product, service, and/or company that will be discussed or considered during the proposed program.



# Alabama Medicaid Telemedicine

## Telemedicine—

- Remote evaluation, diagnosis and treatment of patients by means of telecommunication technology.
- Remote delivery of health care services such as health assessments or consultations, over the telecommunications infrastructure.



# Alabama Medicaid Telemedicine

## Telehealth—

- Use of telecommunications and information technologies to share information and
- Provide clinical care, education, public health, and administrative services at a distance.      HRSA 2016



# Alabama Medicaid Telemedicine

- History
  - Began coverage for Psychiatry and Dermatology specialists in 2010
    - 50 mile limitation
  - Expanded to all physician types with Alabama Medical license in 2012
    - 50 mile limitation removed
  - No origination or transmission fees



# Alabama Medicaid Telemedicine

- All physicians with
  - Alabama medical license
  - Enrolled as Alabama Medicaid provider
  - Regardless of location
- Are eligible to participate in Telemedicine Program to provide
  - Medically necessary telemedicine services to Alabama Medicaid eligible recipients



# Alabama Medicaid Telemedicine

- In order to participate in Alabama Medicaid Agency (AMA) telemedicine program:
  - Physicians must be enrolled with AMA with specialty type 931 (Telemedicine Service)
  - Physician must submit the Telemedicine Service Agreement/Certification form located on AMA website at <http://medicaid.alabama.gov>
  - Physician must obtain prior consent from recipient/patient before services are rendered; counts as part of benefit limit of 14 annual physician office visits currently allowed



# Alabama Medicaid Telemedicine

- Telemedicine services must be administered via interactive audio and video telecommunications system with 2-way communication between distant site physician and origination site where recipient is located
- Does not include phone, e-mail, or fax between physician, recipient, or consultation between two physicians





# Alabama Medicaid Telemedicine

- Telemedicine health care providers shall ensure telecommunication technology and equipment used at both physician and recipient sites is sufficient to allow appropriate evaluation, diagnosis, and/or treatment of recipient for services billed
- Transmissions must employ acceptable encryption to protect confidentiality/integrity of transmission information and acceptable authentication/identification procedures for sender/receiver



# Alabama Medicaid Telemedicine

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- Provider shall maintain appropriately trained staff immediately available in person to recipient receiving telemedicine service to attend to any emergencies that may occur during session
- Physician shall implement confidentiality protocols that specify individuals who have access to electronic records, usage of unique passwords, ensure system to prevent unauthorized access, ensure system to track/record access to electronic medical info

# Alabama Medicaid Telemedicine

- Procedure codes covered for telemedicine
  - Consultations (99241-99245, 99251-99255)
  - Office or other outpatient visits (99201-99205, 99211-99215)
  - Individual psychotherapy (90804-90809)
  - Psychiatric diagnostic (90801)
  - Neurobehavioral status exam (96116)
- No reimbursement — origination site or transmission fees



# Alabama Medicaid Telemedicine

- Bill with modifier GT for telemedicine claims.
- Alabama Medicaid recognizes claims with place of service 02 and the new CPT modifier 95, but does not require them for Medicaid claims.



# American Medical Association 2017

## Guiding principles:

- Must establish a valid patient-physician relationship before provision of telemedicine services through
  - A face-to-face examination if it would be required in provision of same service not delivered via telemedicine or
  - Consultation with another physician who has ongoing patient-physician relationship with patient or
  - Meeting standards of medical specialty societies evidence-based clinical practice guidelines regarding establishing patient-physician relationships.



# American Medical Association 2017

- Abide by State Licensure Laws, State Medical Practice Laws, and consistent with State Scope of Practice Laws in state where patient receives services
- Must be licensed in state where patient resides and service is being performed
- Evidence-based practice guidelines to ensure patient safety, quality of care, and positive health outcomes



# American Medical Association 2017

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- Same standard of care that applies to traditional health care setting should also apply to telemedicine
- Coordinate care with patient's medical home and/or existing treating physician
- Must establish protocols for referrals for emergency services.



# AMA Telemedicine Utilization

TOTAL: \$235K\*

Fiscal Year 2010-2017

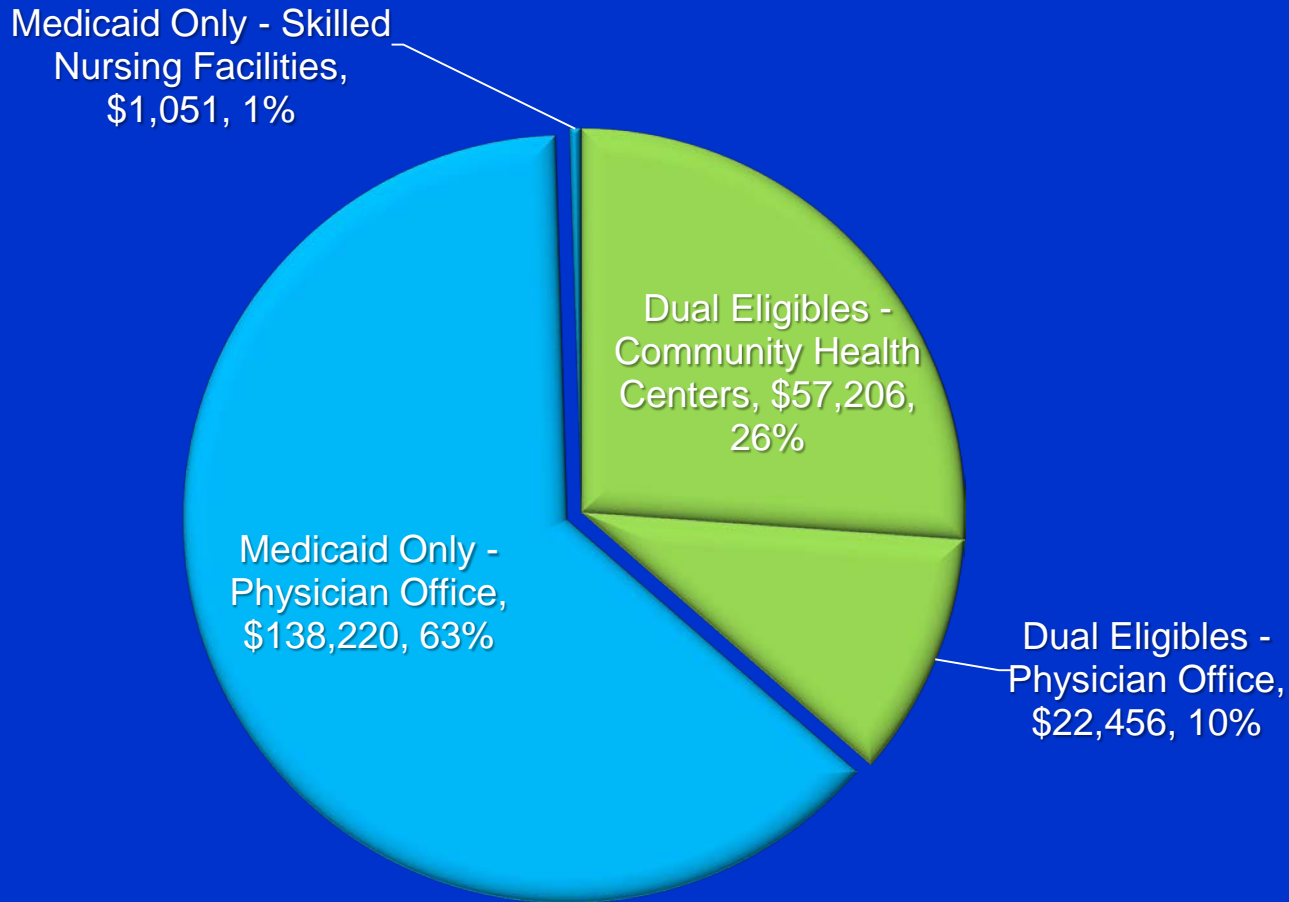


\* Over 8,595 claims for Medicaid/Medicare dual eligibles (PSY 18%); 2,290 Medicaid only with a third PSY(30%) for Medicaid only.





# AMA Telemedicine Utilization-Cont'd



# AMA Regional Care Organizations (RCOs)

- Alabama Code § 22-6-150 et seq—creation of provider-based nonprofit corporations paid on capitated basis to provide
  - full scope of Medicaid benefits,
  - care coordination, and
  - a medical home for Medicaid beneficiaries
- 5 Regions

**7/27/17 Pursue Alternate delivery system to RCOs**



# Alternative to RCOs

## Why?\*

- Major Changes in federal regulations—new CMS Managed Care Rule Regulations
- Funding considerations at state and federal levels
- Potential for new opportunities for state flexibility regarding Medicaid spending/services under President Trump's administration

\*Per Commissioner Azar's statement 7/27/17



# Alternative to RCOs→Pivot→Network

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- RCOs end 7/27/17
- Alternative to RCOs-Pivot Plan
- June 2018 Pivot Plan became Alabama Coordinated Health Network (ACHN)



# Alabama Coordinated Health Network (ACHN)

- Single care coordination delivery systems
- Effectively links patients, providers, and community resources to achieve optimal health outcomes
- Replaces silos in current care coordination efforts
- Unified structure for care coordination in seven newly defined regions
- Care coordination services provided by Primary Care Case Management Entities (PCCM-Es) or Network Entities



# Alabama Coordinated Health Network (ACHN)

## Network Entities

- Provide care coordination services only for:
  - Primary care recipients
  - Maternity care recipients
  - Plan First family planning recipients



# Alabama Coordinated Health Network (ACHN)

## Benefits

- Seamless care coordination services across multiple eligibility categories
- Care coordination services available to more recipients, not just limited to Health Home recipients with chronic conditions
- Reduced barriers impacting health outcomes
- Greater ability to address statewide and regional health outcome goals



# Alabama Coordinated Health Network (ACHN)

## Recipients

- Approximately 750,000 recipients to be impacted by ACHN
  - Current Patient 1<sup>st</sup> recipients
  - Maternity Care recipients
  - Plan First recipients
  - Foster children/Former Foster Children
- Excluded: Dual Eligibles (Medicare recipients) and LTC/Waiver recipients





# Alabama Coordinated Health Network (ACHN)

## Incentives for Quality

- Network Entities will be incentivized to provide higher quality care
  - To achieve better health outcomes
  - To provide higher volume of care coordination services
- Primary care providers (PCPs), including maternity care providers, will also be incentivized
- Quality metrics include Well child visits, Immunizations, BMI, Prenatal/Postpartum care, Substance Abuse Care Coordination



# Alabama Coordinated Health Network (ACHN)

## Quality Improvement Projects (QIPs)

- Network Entities will have quality improvement projects focusing on population priorities such as:
  - Substance Abuse
  - Infant Mortality
  - Obesity and Obesity Prevention



# Alabama Coordinated Health Network (ACHN)

## Next Steps

- Submit waiver request to CMS
  - 1915 (B) waiver
  - Issue Request for Proposal (RFP) in each of the seven regions



# Medicaid Telemedicine

- For more details on the Alabama Coordinated Health Network (ACHN) or Telemedicine go to website at [www.medicaid.alabama.gov](http://www.medicaid.alabama.gov)
- For program or policy questions, email [elizabeth.huckabee@medicaid.alabama.gov](mailto:elizabeth.huckabee@medicaid.alabama.gov).
- Questions
- Thank you

