

CMS Issues Telehealth Toolkit

Amundsen Davis Health Care Alert
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On April 23, 2020 the Centers for Medicare & Medicaid Services (CMS) issued a “toolkit” intended to help accelerate the adoption of broader telehealth coverage policies in Medicaid and Children’s Health Insurance Programs (CHIP). The toolkit is directed to states, but it provides helpful guidance for health care providers evaluating expansion of telemedicine and telehealth services. It should also prove beneficial as provider associations work with state agencies to negotiate coverage, reimbursement and compliance standards.

CMS is expressly encouraging states to consider and adopt telemedicine and telehealth options and make it easier for Medicaid and CHIP patients to receive health care services and support at home or in a safe setting rather than at a clinic or institutional setting. As part of this initiative, CMS also noted that it has expanded access to Medicare telehealth services during the current COVID-19 emergency, including by allowing clinicians to provide telemedicine services along with virtual check-in services to new or established patients.

One positive feature in the announcement was the advice that a State Plan Amendment (and the associated time delays) would not be required if payments for the telemedicine services are made in the same manner as when the services are delivered in face-to-face settings. It is also possible that ancillary costs (e.g., technical support, transmission charges, and equipment) could be reimbursed as an administrative cost by the state.

One other point relates to the form of communication. While two-way audio/visual communication is the dominant and preferred form, the toolkit acknowledges that telehealth can take much broader forms, such as patient monitoring. It should also be noted that Medicaid is allowing telephone (audio) only communication during this COVID-19 emergency period.

As noted by CMS Administrator Seema Verma, “I’m urging states to use this toolkit to make sure our Medicaid patients, particularly our children, can continue to receive needed care from the safety of their homes.” She has voiced encouragement for expanding telemedicine and telehealth services following this emergency period, and the issuance of this toolkit provides a roadmap for CMS’s thinking.

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