

Telehealth Update

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#IN THIS
TOGETHER 
Ohio

Emergency Telehealth Expansion

Ohio ODM's COVID-19 Response



Expanded telehealth services to include a wide array of medical, clinical and behavioral health providers and counselors



Eased technology restrictions on patient-physician interaction to deliver telehealth services



Temporarily reduced prior authorization requirements



Eliminated in- and out-of-network restrictions & pharmaceutical co-pays while increasing pharmacy reimbursements for over the counter medications



Enabled nursing home and congregate care members to access telehealth services with no prior authorization



Ohio Stakeholder Feedback

*Since the signing of Executive Order 2020-05D, Ohio Medicaid has received **overwhelming support** for its rapid expansion of telehealth services from **both patients and providers.***



“The relaxation of rules regarding telehealth has undoubtedly led to significantly better care for our patients during these challenging times.

- Dr. Robert Stone, MD
Senior Medical Director of Ambulatory Services
Central Ohio Primary Care Physicians



Early data shows telehealth use skyrocketed during initial months of the COVID-19 State of Emergency.

Physical Health Service Telehealth claims



Mental Health and Addiction Service telehealth claims



Telehealth Moving Forward

Vision & Goals for Telehealth

A regulatory framework that expands **clinically appropriate** telehealth services while maintaining the **fiscal sustainability** and **integrity** of Ohio's Medicaid program

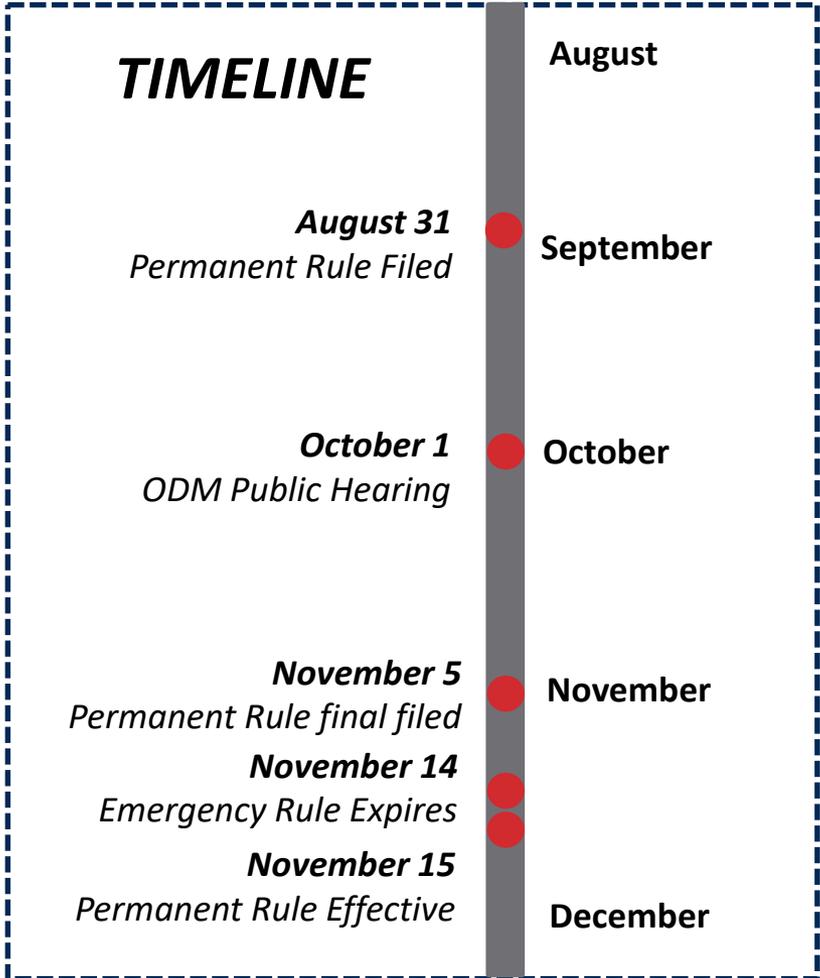
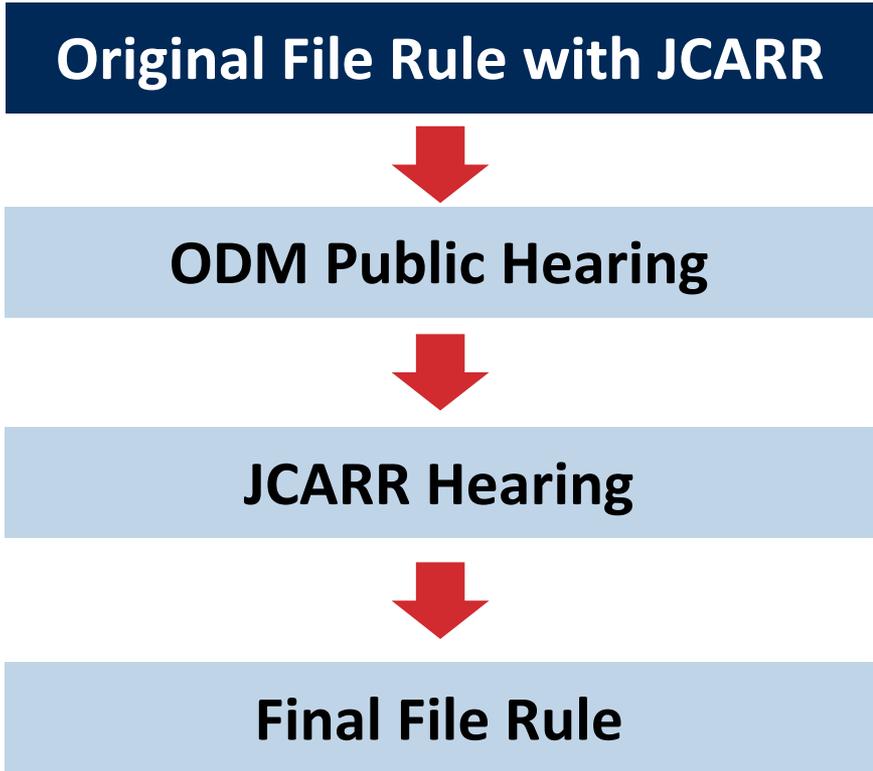
GOALS

- 1 *Maintain quality of care*
- 2 *Enhanced access for patients*
- 3 *Improved health outcomes*
- 4 *Flexibility for providers and patients*





Permanent Telehealth Rule Process: 5160-1-18



Ohio Supporting Rule Changes

ODM is working to line up rule package effective dates as closely as possible

Long-Term Services and Supports

- Around 80 rules regarding HCBS, nursing facilities, assisted living, home health, private duty nursing, and hospice providers
- Retains provisions from emergency rule to allow telehealth when clinically appropriate

Community Behavioral Health Rule Changes

- Retains emergency rule provisions to ensure telehealth services are allowed
- Removes “face-to-face” requirement and removes prohibition on services delivered using telephone or video conference
- Allows greater flexibility for fidelity reviews of ACT and IHBT providers

Outpatient Hospital Behavioral Health Rule Changes

- Clarifies behavioral health outpatient policies

Telehealth Rule Outline & Updates

HHS Office of Civil Rights HIPAA Guidance

- In early 2020, many flexibilities were granted to help rapidly relax telehealth regulations in response to COVID 19
- ODM is unclear on how HHS will approach HIPAA guidance and telehealth once the Federal State of Emergency ends
- For example: FaceTime is an acceptable medium for telehealth under the temporary OCR HIPAA guidance – but that may not be maintained in future guidance

Ohio Proposed Permanent Telehealth Rule

1

Defines Patient Site, Practitioner Site, and Telehealth

Maintains asynchronous communication options

What are the changes?

- Telehealth definition now includes remote patient monitoring
- Removes fax as a communication medium
- Communication transfers can occur via “secure patient portal”
- Removes patient & practitioner location restrictions
- Maintains telephone-only service codes 99441 and 99442 but removes 99443

Ohio Proposed Permanent Telehealth Rule

2 Defines Eligible Providers

Maintains all eligible providers from the emergency rule

What are the changes?

- Adds audiology board individuals with a conditional license
- Adds optometrists
- Outpatient hospitals are limited to billing for OPBH services and for services on behalf of licensed psychologists and independent BH practitioners

Ohio Proposed Permanent Telehealth Rule

3

Details Provider Responsibilities

What are the changes?

- Requires patients be seen in person at least annually by either the telehealth provider or the provider usually responsible for delivering clinical care, other than an ER provider
- Adds requirement that practitioners must adhere to rules promulgated by respective licensing boards.



Ohio Proposed Permanent Telehealth Rule

4 Outlines Services Eligible for Telehealth

What are the changes?

- Preserves ability for all telehealth providers to bill consultation E&M codes
- “End stage renal disease” is replaced with “dialysis related services” to be more inclusive
- Optometry services are added
- Adds periodic oral evaluation as a covered telehealth dental service
- Adds interactive complexity which was not previously included in emergency rule

Ohio Proposed Permanent Telehealth Rule

5

Outlines Conditions for Payment

What are the changes?

- Removes provision from the emergency rule allowing a practitioner site to bill an originating fee through telehealth.
- Adds requirements regarding claims submission clarifying providers must follow ODM billing guidelines when submitting telehealth claims.



Ohio Questions and Contact Information

Link to rule

<http://www.registerofohio.state.oh.us/rules/search/details/314341>

Provide feedback to the Ohio Department of Medicaid by emailing
rules@medicaid.ohio.gov.