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STRATEGIZE
INNOVATE
IMPLEMENT
TRANSFORM

Telehealth for the Long Term

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Disclosures

Alison L. Bailey, MD

• OptumRx: Consultant

• GE Healthcare: Consultant

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None



Who are our patients?

- Improved Access
- Optimal Convenience
- Accessible Education
- Home-based Care
- Personalized Approach
- Holistic Investment







The Telehealth Landscape



Asynchronous Communication: PROMs, Electronic Consultation



Blended Care: In-person and Virtual synchronous visits



Clinical remote monitoring, medical grade devices



Digital tracking and wearables



Emerging analyses: Data and Artificial Intelligence





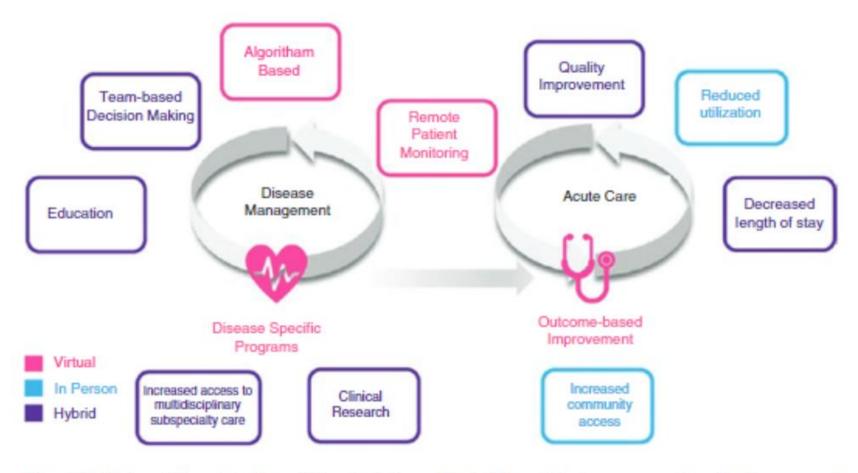


Fig. 6.1 Using fully virtual, traditional visits and hybrid models to manage chronic disease and provide acute care



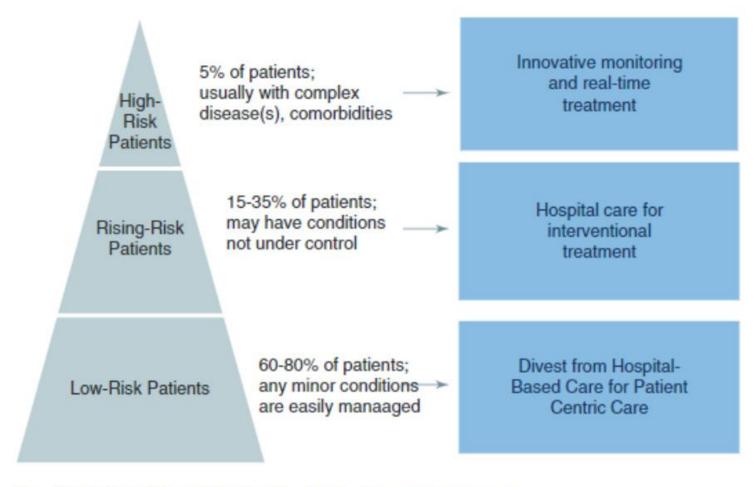


Fig. 6.2 Patient risk stratification for chronic disease management



What is Telehealth?

- Synchronous care is a 'real-time' interaction for patient health communication. Patients can have caregivers or in-home nursing present to assist the remote physician.
 - Video calls to share progress or check on healing
 - Audio only calls to confirm instructions
 - Text messaging to answer patient questions
- Asynchronous telehealth is communication between providers, patients, and caregivers stored for future reference or response.
 - E-mail or text messages with follow-up instructions or confirmations
 - Images for evaluation
 - Lab results or vital statistics

https://telehealth.hhs.gov/providers/getting-started/



Types of telehealth



Live video - Also referred to as "real-time;" a two-way, face-to-face interaction between a patient and a provider using audiovisual communications technology

Store-and-forward - Remote evaluation of recorded video and/or images submitted by an established patient





Remote patient monitoring – Use of digital technologies to collect health data from patients in one location and electronically transmit that information securely to providers in a different location (data can include vital signs, weight, blood pressure, blood sugar, pacemaker information, etc.)

Audio-only visits - Use of telephone for visits without video

Mobile health (mHealth) – Allows patients to review their personal health data via mobile devices, such as cell phones and tablet computers, which can be done from their home and assists in communicating their health status and any changes; often includes use of dedicated application software (apps), which are downloaded onto devices



Telehealth for Providers: What You Need to Know



"Telehealth" per CMS has specific criteria

- The **originating site** is where the patient is located when the telehealth interaction takes place.
 - In Medicare, it is limited both geographically and by the specific site a patient is located in at the time of the telehealth interaction
 - Prior to the PHE, this could not be the home for the majority of patients

• The distant or referral site is where the medical provider is located



Communication Technology Based Services (CTBS)

- CTBS are not labeled "telehealth" by CMS
- Because of this, providers may bill and get reimbursed for them even if the patient is at home or if they live in a city
- Introduced in 2019 in order to reimburse providers for a review of an image or for a brief conversation with their patients
- CMS noted in the 2020 final rule that the CTBS should be patientinitiated



Virtual Check In

• A virtual check-in lets professionals bill for brief (5-10 min) communications that mitigate the need for an in-person visit and can be furnished via any synchronous telecommunications technology

 E-visit is similar to a virtual check-in, but used when communication occurs through an online patient portal

Communication Technology Based Services (CTBS)

• G2010:

 Remote evaluation of recorded video and/or images submitted by an established patient, e.g., store-and-forward

• G2012

- Virtual check-in, by a physician or other qualified health care professional who can report evaluation and management services
- 5-10 minutes of medical discussion

• G2252

- Issued by CMS for calendar year 2021
- Will bridge audio only services provided by the telephone evaluation and management calls, which payment ceases immediately at the end of the PHE
- 11-20 minutes of medical discussion





Remote Physiologic Monitoring—Examples

- Glucose meters for patients with diabetes
- Heart rate and/or blood pressure monitors
- Caloric intake or diet logging programs
- Weight/urine output for heart failure patients





Remote Physiologic Monitoring

• 99453/99454:

- Staff service: initial set up of device; bill after 16 days of monitoring
- Staff or facility service: covers initial device payment; bill after 16 days of receipt of and monitoring readings, bill every 30 days

• 99457:

 QHP service; 20 minutes of Non-F2F and F2F time spent in analysis and via synchronous communication with patient the findings or care plan

• 99458:

Add-on code; full additional 20 minutes for services described in 99457



Econsult or Interprofessional Consult

• 99451:

- **Provided by a consultative physician**, including a written report to the patient's treating/requesting physician or other qualified health care professional
- 5 minutes or more of medical consultative time

• 99452:

- Provided by a treating/ requesting physician or other qualified health care professional
- 30 minutes
- 99446-99449:
 - **Provided by a consultative physician,** including a **verbal and written report** to the patient's treating/ requesting physician or other qualified health care professional
 - 5 minutes through and over 31 minutes





Transitional Care Managment

Moderate/99495:

- Contact patient within 2 days after discharge, modality (telephone, electronic) or direct contact
- A follow-up visit must occur face-to-face within 14 calendar days of discharge.

• High/99496:

- Contact patient within 2 days after discharge, modality (telephone, electronic) or direct contact
- A follow-up visit must occur face-to-face within 7 calendar days of discharge.



Telehealth changed by the PHE

- 1/31/20: Public Health Emergency declared for US
- 1/16/22: Extended PHE until 4/16/22
- Audio-Only Telehealth for Certain Services
 - Pursuant to authority granted under the CARES Act, CMS is waiving the requirements for use of interactive telecommunications systems to furnish telehealth services, to the extent they require use of video technology, for certain services

Telehealth changed by the PHE

• The waiver temporarily eliminates the requirement that the originating site must be a physician's office or other specified type of healthcare facility located in a rural area and allows Medicare to pay for telehealth services furnished to beneficiaries in their homes or any setting of care.

Medicare Fee For Service Billing 1135 Waiver FAQs



Public health emergency (PHE) policy update

During the PHE, HHS issued a <u>temporary notice</u> to allow covered providers to use popular non-public facing communications apps to deliver telehealth during the COVID-19 PHE, such as:

Apple Facebook Google
FaceTime Facebook Messenger Hangouts Zoom Skype
video chat video

HIPAA-compliant video communication products



Telehealth for Providers: What You Need to Know





Telehealth during the PHE

Visit Includes:

Video + Audio

Real-Time

Report POS as if in-person + modifier 95

CPT Code:

99201-99205 (new) 99211-99215 (est)

Audio

Real-Time

Telephone E&M visit 99441 (5-10 mins) 99442 (11-20 mins) 99443 (20-30 mins)

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Communication Technology-Based Service (CTBS)

Visit Includes:

CPT Code:

Audio

Asynchronous

>7 days from E/M service

G2012

Virtual Check-in 5-10 mins

G2252*

Virtual Check-in 11-20 mins

Picture/Video

Asynchronous

Interpretation w/in 24 hours

G2010

Remote evaluation of recorded video and/or images





Remote Evaluation Codes

Visit Includes:

CPT Code:

E-visit/Online portal

Asynchronous

Cumulative time during 7 days

99421 5-10 mins 99422 11-20 mins 99423 >/=21 mins

During the PHE, all four codes may be billed after two days of data collection if the patient has a confirmed or suspected case of COVID-19

S





Other Remote Options

Visit Includes: CPT Code:

During the PHE, the in-person or face-to-face encounter may be conducted via telehealth

E-consult
Interprofessional
Consult

Asynchronous

Review & Report

99446-99449 99451 99452

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LIST OF MEDICARE TELEHEALTH SERVICES effective January 1, 2022 - updated January 5, 2022											
								Can Audio-only			
i	Interaction Meet the Medicare Payment										
Code Short Descriptor Status Requirements? V Limitations V											
97542	LIST OF MEDICARE TELEHEALTH SERVICES effective January 1, 2022 - updated January 5, 2022										
97750											
97755								Can Audio-only	у		
97760				Nai	me Box		LIST OF M	MEDICARE TELEHEAL	TH SERVICES effective Jan	uary 1, 2022 - updated January 5,	2022
97761 =	Code 🔻	Short Descriptor	▼ Status								
97802	99343	Home visit new patient	Temporary Addition for the PHE	∃ for							Can Audio-only
97803	99344	Home visit new patient	Temporary Addition for the PHE								Interaction Meet the
97804	99345	Home visit new natient	Temporary Addition for the PHF		Code 🔻	Short Descriptor	▼ Status				Requirements?
99202	99347	Home visit est p				Ic int pow 2501-5000 g subsq	Available up	o Inrough December 31, 20	23		
99202		Home visit est p				Assmt & care pln pt cog imp Trans care mgmt 14 day disch					
99203		Home visit est p				Trans care mgmt 14 day disch					
	99350	Home visit est p				Advncd care plan 30 min					Yes
99205		Prolong e&m/ps Code	Short Descriptor			Advncd care plan 30 min					Yes
99211		Prolong e&m/ps 92604				Diab manage trn per indiv					Yes
99212		Prolonged servie 92607		 -		Diab manage trn ind/group					Yes
99213		Prolonged servie 92608		 '		Mnt subs tx for change dx					Yes
99214	99406	Behav chng smc 92609				Visit to determ ldct elig					Yes
99215		Behav chng smc 92610	-			Alcohol/subs interv 15-30mn					Yes
99217	99441	Phone e/m phys 92625	Γinnitus assessment			Alcohol/subs interv >30 min					Yes
99218	99442	Phone e/m phys 92626	Eval aud funcj 1st hour			Inpt/tele follow up 15					Yes
99219	99443	Phone e/m phys 92627				Inpt/tele follow up 25					Yes
99220		Neonate crit care 93750	Interrogation vad in person	Ten (G0408	Inpt/tele follow up 35					Yes
99221		Neonate crit care 93797	Cardiac rehab	Ava	G0410	Grp psych partial hosp 45-50	Temporary .	Addition for the PHE for the	e COVID-19 Pandemic—Added	d 4/30/20	
99222		Ped critical care	Cardiac rehab/monitor	Ava (G0420	Ed svc ckd ind per session					Yes
_		Ped critical care 94002	Vent mgmt inpat init day	Ten(Ed svc ckd grp per session					Yes
· ·	99473		Vent mgmt inpat subq day	Ten		Intens cardiac rehab w/exerc	Available up	Through December 31, 20	23		
						Intens cardiac rehab no exer	Available up	Through December 31, 20	23		
				Ten		Inpt/ed teleconsult30					Yes
				 		Inpt/ed teleconsult50					Yes
						Inpt/ed teleconsult70					Yes
						Ppps, initial visit					Yes
				-	C0420	D	I				17

https://www.cms.gov/Medicare/Medicare-General-Information/Telehealth/Telehealth-Codes

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Key Medicare changes at a glance

CARDIOVASCULAR
PATIENT VISITS
WERE MADE
UTILIZING
TELEMEDICINE.

MARCH 30, 2020
OF ENCOUNTERS
WERE BY SOME
FORM OF REMOTE OR
TELEMEDICINE MEANS.

Requirement Type	Pre-COVID-19 PHE Policy	Current COVID-19 PHE Policy		
Patient site/geographic location	Payment available only for care at certain facility types with limited services for home-based patients Patient location must be rural or outside a metropolitan statistical area (MSA)	No restrictions on geographic location Patients can be at home or any other setting		
Services	Payment available for about 90 services, as captured by CPT/HCPCS codes	Payment available for about <u>250</u> <u>services</u> , as captured by CPT/ HCPCS codes, as of March 2021		
Telehealth modality	Payment for live video only, except for certain demonstration projects in Alaska and Hawaii	Payment available for live video, with audio-only phone for E/M services, behavioral health counseling, and educational services		
	Payment available for services	Payment available for all health care		

Provider type

Payment available for services furnished by limited list of 9 provider types

Payment available for all health care professionals who are eligible to bill Medicare for professional services

Telehealth for Providers: What You Need to Know

MedAxiom. "Reinventing cardiovascular care in two weeks: an industry adapts to a pandemic"





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delinical Topics Latest In Cardiology Education and Meetings Tools and Practice Support

My ACC V

Rapid implementation of telehealth has been a key component of the COVID-19 response. Below find links to clinical guidance, expert perspectives and critical coding, reimbursement and other health policy resources to help with not only implementing telehealth, but navigating changing coverage policies and ensuring patients make the most of the experience.





What You Need To Know: Telehealth Services

Billing for Telehealth Encounte

AN INTRODUCTORY GUIDE ON FEE-I

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March 2021

www.cchpca.org/

Clinical Guidance

- ✓ Telehealth and Cardiovascular Disease Prevention: A Discussion of the Why and the How
- ✓ ACC/HRS/EHRA/APHRS/LAHRS/AHA Release Guidance Document on Telehealth and Arrhythmia Monitoring During COVID-19
- ✓ ACC and Heartbeat Health Revolutionize Cardiology With Breakthrough Virtual Care
- ✓ Telemedicine Part 1: Nuts and Bolts
- ✓ Telemedicine Part 2: Nuts and Bolts
- ✓ Telehealth: Rapid Implementation For Your Cardiology Clinic
- ✓ CardioSmart Patient Education





ons (FAQs) on) Billing

J FAQs: 1135 Waiver FAQs,

QsAs1135Waiver.pdf.



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States/Medicaid/

• Telehealth policy trends two states alike in how tregulated. **SUMMARY CHART**

of Key Telehealth Policy Areas

This chart provides a quick reference summary of each state's telehealth policy on Medicaid reimbursement, private payer reimbursement laws (both if a law exists and whether or not payment parity is required), and professional requirements around interstate compacts and consent based on information gathered between June and September 2021. For further details, and additional categories, see each state's section on CCHP's telehealth <u>Policy Finder</u> tool.

		MEDICAID R	EIMBURSEMENT		PRIVATE PAYER LAW		PROFESSIONAL REQUIREMENTS	
STATE	LIVE VIDEO STORE-AND-FORWARD		REMOTE PATIENT MONITORING	AUDIO-ONLY	LAW EXISTS	PAYMENT PARITY	INTERSTATE COMPACTS (see key)	CONSENT REQUIREMENT
ALABAMA	0	8	0	8	8	8	IMLC, eNLC, EMS, PSY, PTC, ASLP-IC	0
ALASKA	0	S	Ø	8	Ø	8	-	Ø
ARIZONA	0	0	0	0	0	0	PTC, PSY, NLC, IMLC (conditionally repealed)	0
ARKANSAS	0	8	Ø	Ø	Ø	8	PTC, NLC	0
CALIFORNIA	0	0	⊘ *	0	0	0	-	0
COLORADO	Ø	8	Ø	0	0	8	IMLC, PTC, PSY, NLC, EMS, OTC, ASLP-IC	Ø

State Telehealth Laws and Reimbursement Policies/Center for



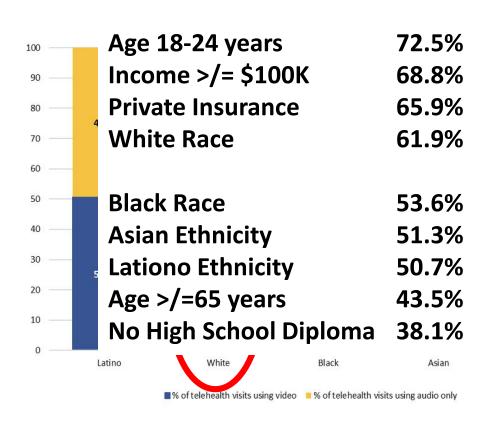
State Example: Tennessee

- Blue Cross Blue Shield of Tennessee has seen telehealth use surge during the coronavirus crisis... The insurer is making its coverage of virtual visits with in-network providers permanent.
- Waivers allowing out-of-state healthcare professionals to practice via telemedicine, most recently included in EO 90, expired November 19, 2021, and haven't been renewed
- Out-of-state DO telemedicine licensure The TN Osteopathic Board will issue a telemedicine license.
 - An applicant who has an unrestricted license in good standing in another state and maintains an unencumbered certification in a recognized specialty area; or is eligible for such certification and indicates a residence and a practice outside the State of Tennessee but proposes to practice osteopathic medicine across state lines on patients within the physical boundaries of the State of Tennessee, shall in the discretion of the Board be issued a telemedicine license.

Telehealth Trends

Trends in overall telehealth use 30 Percent (%) of respondents who used telehealth within the last 4 weeks 670,155 adults 23.1% Children Week Survey was Administered

Predictors of Video Use



Karimi, M. US Dept of HHS. February 2022



41.2

58.9

Multiracial or Other

Telehealth can Improve Outcomes

- The Telehealth After Stroke Care strategy had a significant improvement in patient follow-up: 84% of patients in the enhanced telehealth group completed the 12-week study, compared to 64% of patients in the usual care group.
- 91% of patients in the enhanced telehealth group completed the video visit with primary care professionals and specialists, compared to 75% of patients in the usual care group.
- Blood pressure control was better in the enhanced telehealth group at 76%, compared to 25% control in the control group.
- Among Black study participants, blood pressure control improved from 40% of participants at enrollment to 100% at the study's conclusion in the enhanced

American Stroke Association International Stroke Conference 2022



Advocacy

- Patient satisfaction surveys and claims data from CMS and private health plans demonstrate that *many Americans have come to see* telehealth as one of the most positive improvements to our nation's health care system in recent memory
- U.S. Sens. Catherine Cortez Masto, D-Nevada, and Todd Young, R-Indiana introduced bipartisan legislation, the *Telehealth Extension and Evaluation Act*, to extend current Medicare telehealth reimbursement waivers an additional two years following the end of the PHE

Advocacy

Legislative Update

Telehealth Bills Advance to Full Committee, Coverage of Emergency Services Passes House

This week proved favorable for TMA's government affairs team and coalition members, as both telehealth bills cleared their first legislative hurdle in the House Insurance subcommittee on Tuesday.

Payment Parity (HB2655) carried by committee chairman, Rep. David Hawk (R-Greeneville) passed handily out of the subcommittee having received no opposition. Audio-only Telehealth (HB1843), on the other hand, spurred more discussion from committee members as they sought to understand how audio-only encounters occur in practice.

To help illustrate, Dr. Mark Sittig, radiation oncologist from Tennessee Oncology, shared two patient examples demonstrating how audio-only telehealth can be clinically appropriate. His experiences highlighted how audio-only encounters allow for improved patient outcomes through continuity of care.

Despite hearing opposing testimony from Farm Bureau, HB1843 successfully passed out on a voice vote. Both bills move forward to the full



committee, which is scheduled to meet Tuesday, Feb. 22 at 9 am CT.



Access

-Affordability/cost -Insurance coverage (public/private) -Reimbursement

Successful Implementation and Adoption

Education

-Awareness of telemedicine offerings and benefits

-Integration into physician's and hospital established clinical workflow

- -Privacy ensured
- -Preserve quality of care
- -Demonstrate equal or improved outcomes

Experience

-Ease of use

-Ease of setup (e.g. between visits/cases)

-Reliability

-Transmission quality

-Equipment portability
-Seamless functionality within
hospital network

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Future

- Payment parity between telehealth and in clinic care
 - Regulatory change governing payment parity will need to be sustained after the pandemic
- State boundaries
 - Cross-state billing remains a significant barrier for clinicians who are not part of an in-state health care network



Future

Privacy

- The OCR issued a notice stating that it will not impose HIPAA violations during the PHE; allowed clinicians to use platforms that are not HIPAA compliant
- Will require consideration of the long-term issues with these platforms

Focus on Minimizing Disparities

- Policy efforts to ensure equitable access to telehealth, in particular video-enabled telehealth
- Rural areas and underprivileged communities are especially at risk, as are healthcare providers who serve these areas
 - 21% of rural Americans (or their families) reported difficulty accessing high-speed internet



Discussion



