



Center for Connected Health Policy

# TELEHEALTH & MEDICAID: A POLICY WEBINAR SERIES

*What's Next? A Roadmap for Medicaid Telehealth Policy Beyond the Pandemic*

**February 5, 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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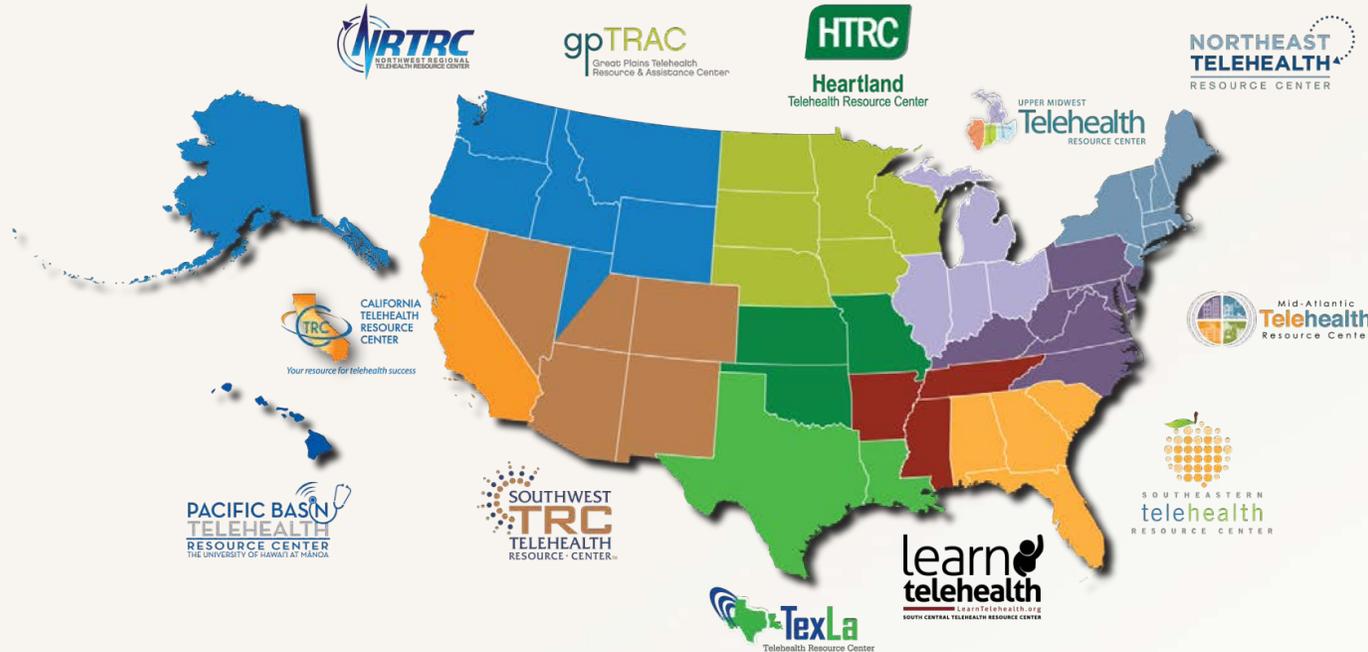
# About CCHP

- Established in 2009 by the California Health Care Foundation
- 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



# NATIONAL CONSORTIUM OF TRCS

TelehealthResourceCenter.org






2 National Resource Centers

NRTRC	gpTRAC	NETRC
CTRC	HTRC	UMTRC
SWTRC	SCTRC	MATRC
PBTRC	TexLa	SETRC

12 Regional Resource Centers

# The CCHP Team



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# Telehealth & Medicaid: A Policy Webinar Series



**April 30, 2021**

**May 7, 2021**

**May 14, 2021**

**May 21, 2021**

*Image source: American Psychological Association*

*This webinar series was made possible by grant number GA5RH37470 from the Office for the Advancement of Telehealth, Health Resources and Services Administration, U.S. Department of Health & Human Services.*



**Follow the discussion!**  
**@CCHP**  
**#MedicaidTelehealthCCHP**

# Today's Webinar



## Presentation #1

Joanne Jee, MPH, Principal Analyst, MACPAC

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## Presentation #2

Dr. Sara Salek, Chief Medical Officer, Arizona Health Care Cost Containment System (AHCCCS)

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## Presentation #3

Tracy Johnson, PhD, Medicaid Director, Colorado Department of Health Care Policy and Financing (CO Medicaid)

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## Presentation #4

Lori Coyner, Medicaid Director, Oregon Health Plan, Oregon Health Authority

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# CCHP Webinar

## **What's Next? A Roadmap for Medicaid Telehealth Policy in a Post-COVID World**

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**Medicaid and CHIP Payment and Access Commission**

Joanne Jee

February 5, 2021

[www.macpac.gov](http://www.macpac.gov)

 [@macpacgov](https://twitter.com/macpacgov)

# Overview

- About MACPAC
- Telehealth in Medicaid: Pre-COVID
- Telehealth in Medicaid: During COVID
- Telehealth in Medicaid: Post-COVID
- MACPAC Resources
- Questions

# About MACPAC

- Provides analysis and advice to Congress and HHS on Medicaid and CHIP policy issues
- 17 commissioners appointed by GAO
- Reports annually on March 15 and June 15
- Technical assistance to Congress
- Information resource to states and the broader health policy community

# Telehealth in Medicaid: Pre-COVID

- Nearly all state Medicaid programs provided some coverage of telehealth
- Substantial state flexibility to cover telehealth
- Many considerations for state telehealth decisions (e.g., connectivity and technology, licensure, privacy, provider workflow)
- Little published data or research on Medicaid use, spending, or outcomes of telehealth

# Telehealth in Medicaid: During COVID

- All states now cover some telehealth
- No changes in federal authorities
- CMS issued telehealth guidance and toolkits
- CMS Medicaid and CHIP Preliminary Data [Snapshot](#) (services through July 31, 2020):
  - Use increased 2,846% from March-July 2020 compared to the same period in 2019
  - Use peaked in April, has decreased since for all age groups
  - Adults age 19-64 had the highest use of telehealth
  - Telehealth offset some but not all of the decline in outpatient mental health services among children and adults

# Telehealth in Medicaid: Post-COVID State Actions and Experience

- Decisions on telehealth coverage and policies
- Approaches and considerations for:
  - Payment
  - Network adequacy
  - Measuring quality and outcomes
  - Preventing fraud, waste, and abuse

# Telehealth in Medicaid: Post-COVID

## State Actions and Experience

- Availability and completeness of data:
  - utilization
  - spending
  - characteristics of users of telehealth
- Effects on access to care
- Quality, beneficiary and provider satisfaction
- Equity in access to telehealth

# MACPAC Resources

- March 2018 report to Congress [chapter](#) on telehealth in Medicaid
- *Changes in Medicaid Telehealth Due to COVID-19* [report](#) and [catalog](#)
- Comment [letter](#) on HHS Report to Congress on Telehealth for Pediatric Substance Use Disorder Treatment
- [www.macpac.gov](http://www.macpac.gov)

# Questions?

*Please submit questions using the Q&A function.*



# Arizona Medicaid Telehealth Coverage

Before, During, and Post-COVID-19 Pandemic

Dr. Sara Salek

Chief Medical Officer, AHCCCS

# Arizona Medicaid Telehealth Coverage: Pre-Pandemic

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



Healthcare services delivered via:

- Telemedicine (interactive audio and video)
- Asynchronous (store and forward)
- Remote patient monitoring
- Teledentistry

# Arizona Medicaid Telehealth Coverage Pre-Pandemic (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

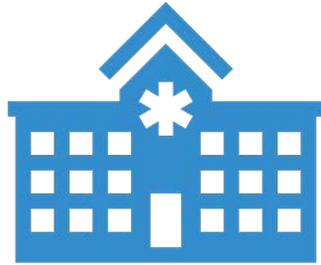


No rural vs. urban limitations



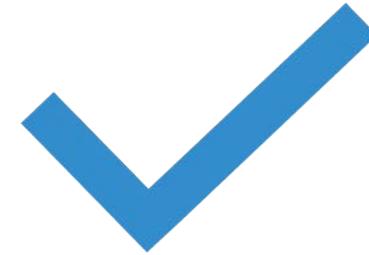
MCOs retained their ability to manage network and leverage telehealth strategies as they determine appropriate

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



**Pre 10/1/19**

Real-time telemedicine limited to 17  
disciplines



**Implemented 10/1/19**

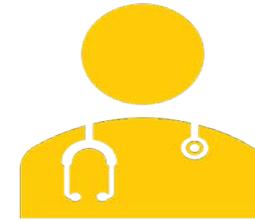
No restrictions on disciplines

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



**Pre 10/1/19**

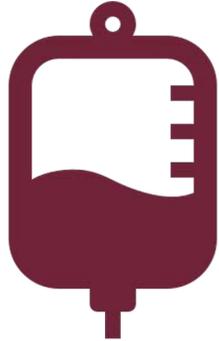
Asynchronous covered in very limited  
circumstances



**Implemented 10/1/19**

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**

Telemonitoring limited to CHF



**Implemented 10/1/19**

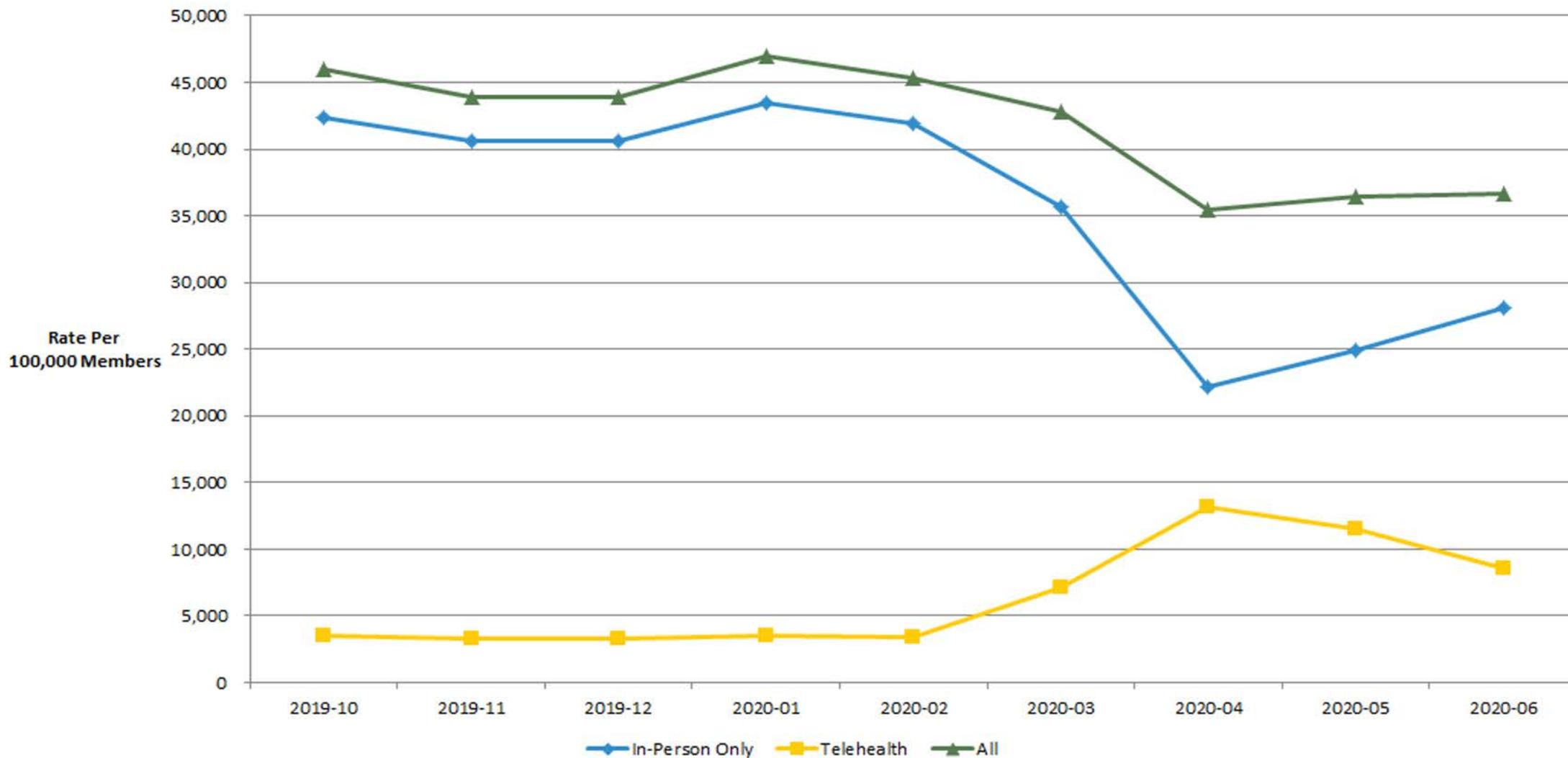
No restrictions on telemonitoring

# Arizona Medicaid Telehealth Coverage: Intra-Pandemic

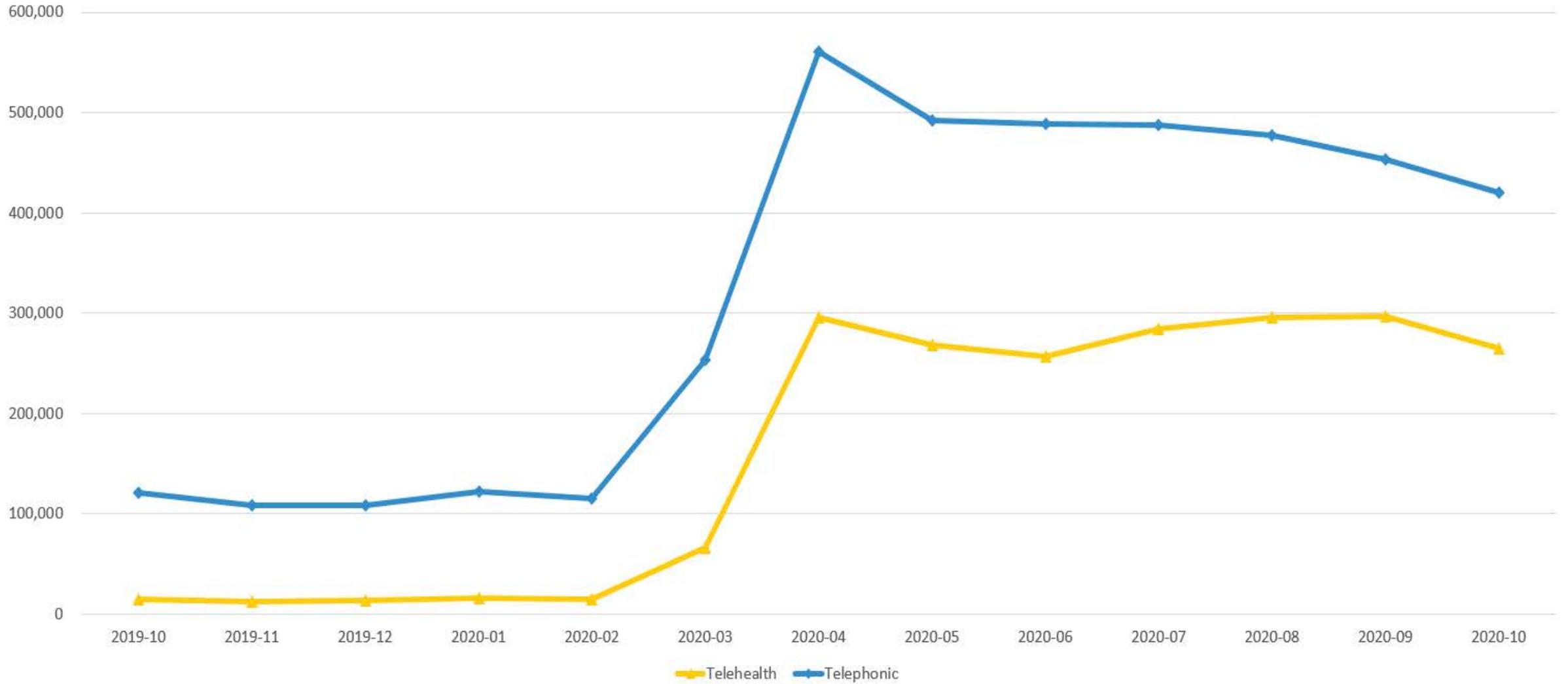
# Arizona Medicaid Telehealth Coverage Intra-Pandemic (March 2020)

- Created Temporary Telephonic Code Set
- Added >150 CPT and HCPCS codes to Telehealth Code Set
- Managed Care Organizations (MCOs) required to:
  - Reimburse at the same rate for services provided “in-person” and services provided via telehealth and/or telephonically
  - Cover all contracted services via telehealth modalities

## FFY20 YTD Statewide Utilization By Mode of Service Delivery (Distinct Member Count by Month, Rate Per 100,000 Enrolled Members)

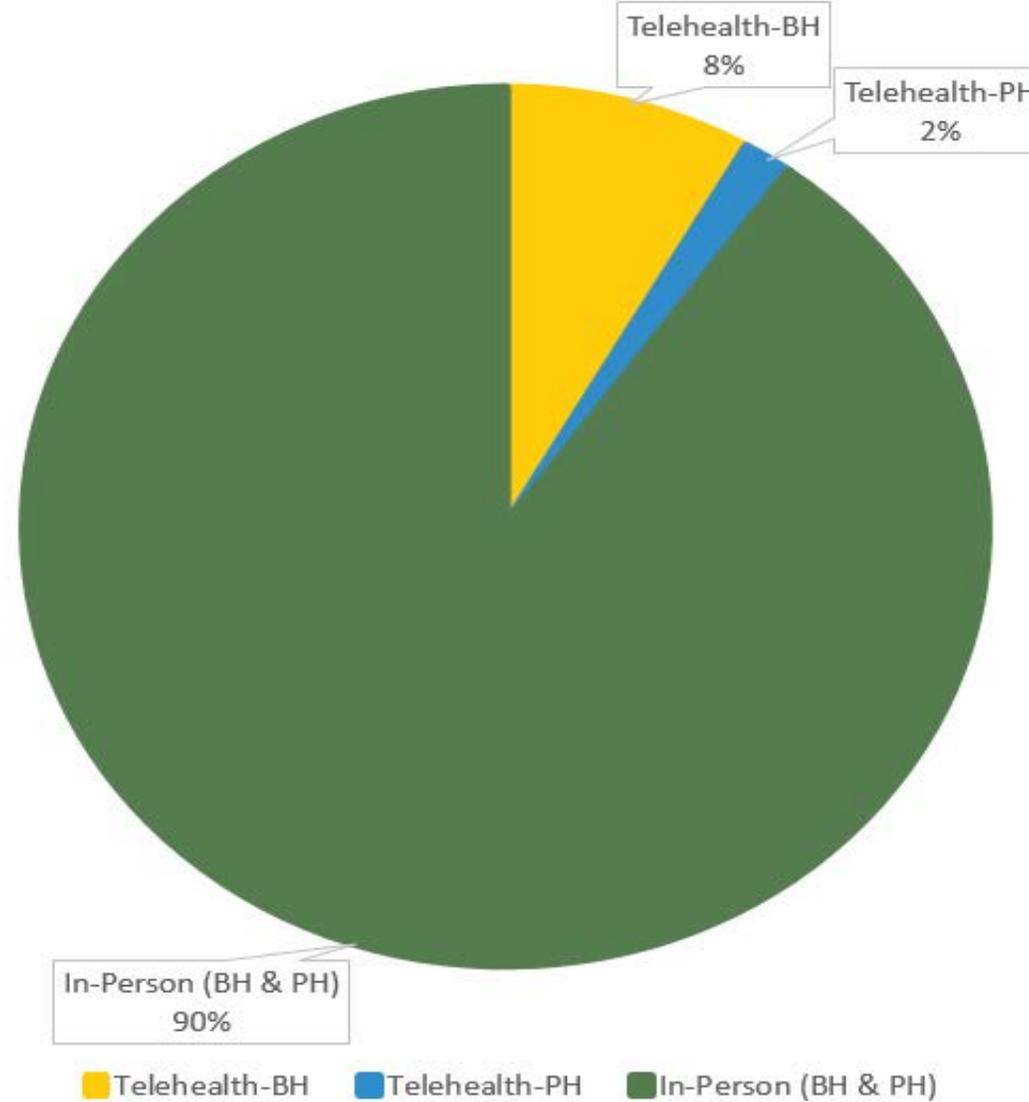


### Telehealth and Telephonic Claims/Encounters Volume (Total # of CRNs, 10/1/2019 - 10/31/2020)



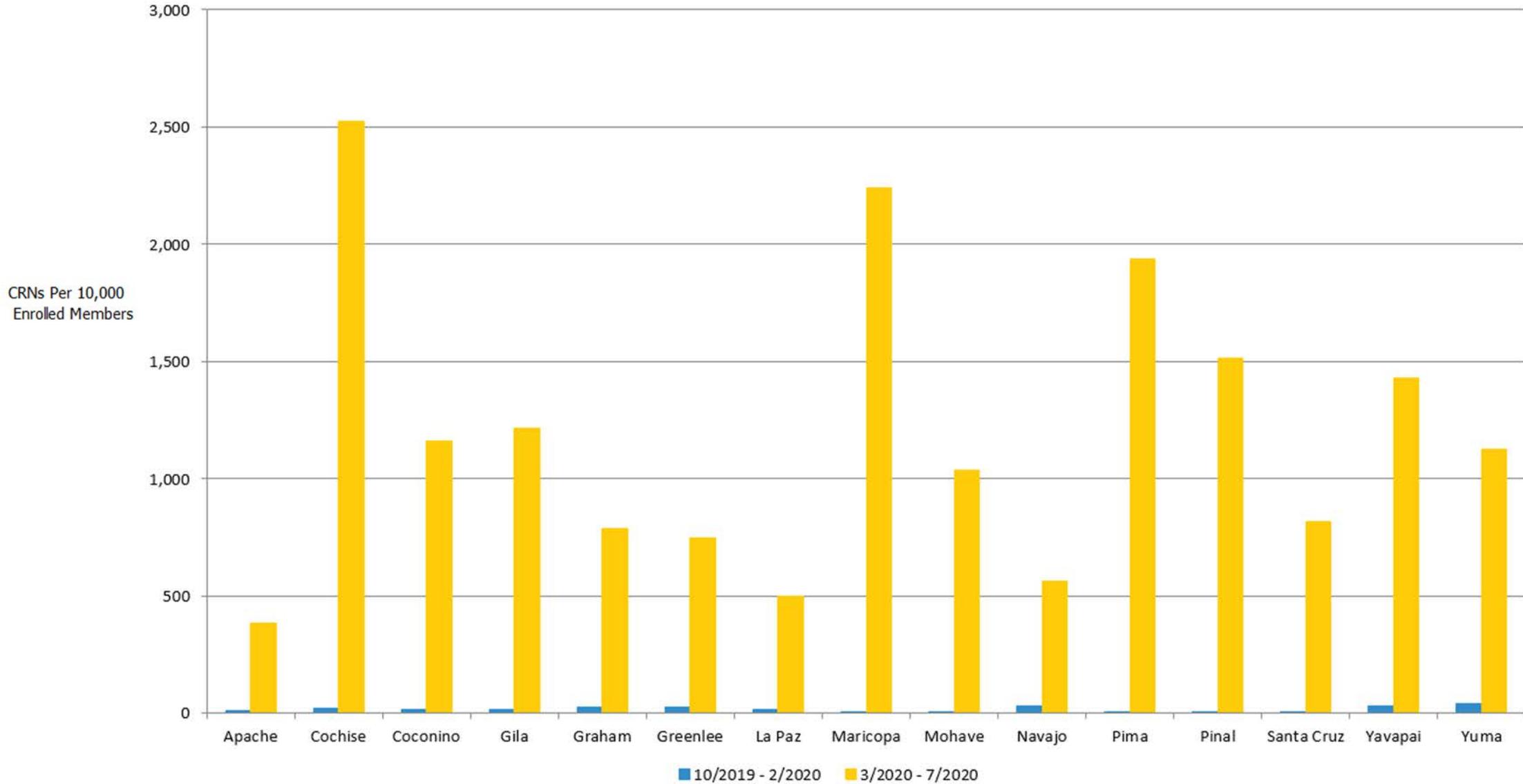
# Distribution of All Claims/Encounters September 2020

(Real-Time Audio/Visual, Store-and-Forward and Telephonic Combined; Delineated By BH and PH)



**Telehealth Physical Health Services Via Real-Time Audio/Visual and Store/Forward  
Pre-Pandemic (10/19-2/20) and Start of PHE (3/20-7/20)**

(Number of Claim Lines/Services Rendered, Rate Per 10,000 Enrolled Members, All LOB)



# Arizona Medicaid Telehealth Coverage: Post-Pandemic Planning

# Arizona Medicaid Telehealth Coverage: Post-Pandemic Planning

- AHCCCS telehealth policy flexibilities for COVID-19 have been extended through 9/30/21
- AHCCCS intends to finalize post-COVID-19 telehealth coverage decisions by 7/1/21

# Arizona Medicaid Telehealth Coverage: Post-Pandemic Planning

- Crosswalking CMS Core Set HEDIS measures NCQA telehealth allowances and Arizona's telehealth code set
- Financial analysis ongoing
- Consumer Assessment of Healthcare Providers and Systems (CAHPS) planned for ACC, CMDP, SMI, and KidsCare in Arizona
  - Adopted Oregon's telehealth supplemental questions for potential cross State analysis

# 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>	<a href="#">Telehealth Code Set</a>	YES
Asynchronous (Store+Forward)	Transmission of recorded health history through a secure electronic communications system	GQ	Originating Site <sup>2</sup>	<a href="#">Telehealth Code Set</a>	YES
Remote Patient Monitoring	Synchronous (real-time) or asynchronous (store and forward)	GT-Synchronous GQ-Asynchronous	Originating Site <sup>2</sup>	<a href="#">Telehealth Code Set</a>	YES
Teledentistry	Synchronous (real-time) or asynchronous (store and forward)	D9995-Synchronous D9996-Asynchronous	Originating Site <sup>2</sup>	<a href="#">Teledentistry Code Set</a> <sup>3</sup>	YES
Telephonic	Audio	None	02-Telehealth	<a href="#">Permanent Telephonic Code Set</a> <sup>3,4</sup>	YES
Telephonic (Temporary)	Audio	UD	Originating Site <sup>2</sup>	<a href="#">Temporary Telephonic Code Set</a> <sup>3,4</sup>	UNDER EVALUATION

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 Adding to master Telehealth Code Set

4 Adding audio-only to Telehealth definition; evaluating modifier and POS coding standards

# Questions for Arizona?

*Please submit questions using the Q&A function.*

# What's Next? A Roadmap for Telehealth Beyond the Pandemic

February 5, 2021

Tracy Johnson, PhD, Colorado Medicaid Director



**COLORADO**  
Department of Health Care  
Policy & Financing

# Telemedicine Policy Goals

Colorado is committed to developing a comprehensive telemedicine policy that:

- improves access to high-quality services
- promotes health equity
- integrates with medical home & neighborhood
- prods innovation thru aligned payment policy
- ensures value for the taxpayer dollar

# Telemedicine Policy Changes

On March 20, 2020, in response to the COVID-19 public health emergency, Colorado expanded its telemedicine coverage to include. These rules were made permanent in June 2020:



Telephone only modality for certain services (and live chat)



Federally Qualified Health Centers, Rural Health Clinics, Indian Health Services, and Community Mental Health Centers

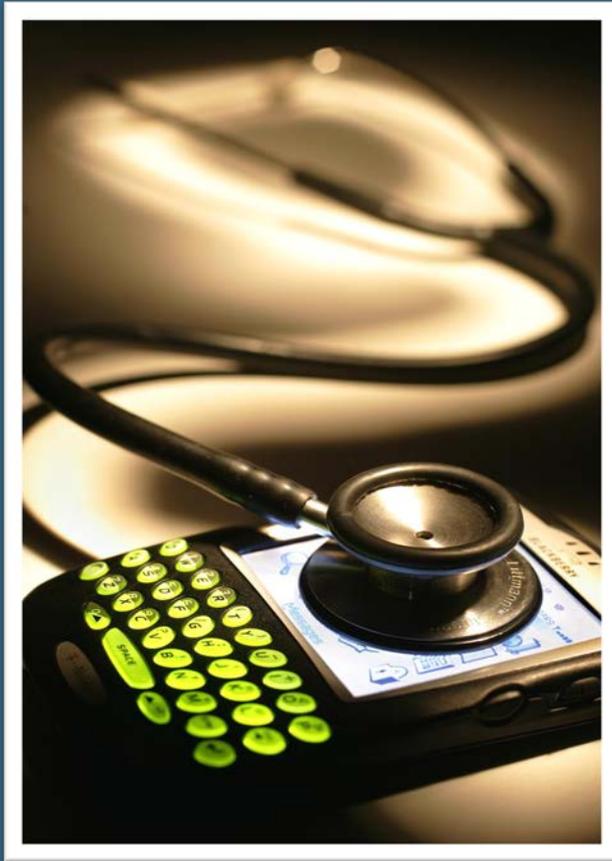


Physical Therapy, Occupational Therapy, Home Health, Hospice and Pediatric Behavioral Health Providers



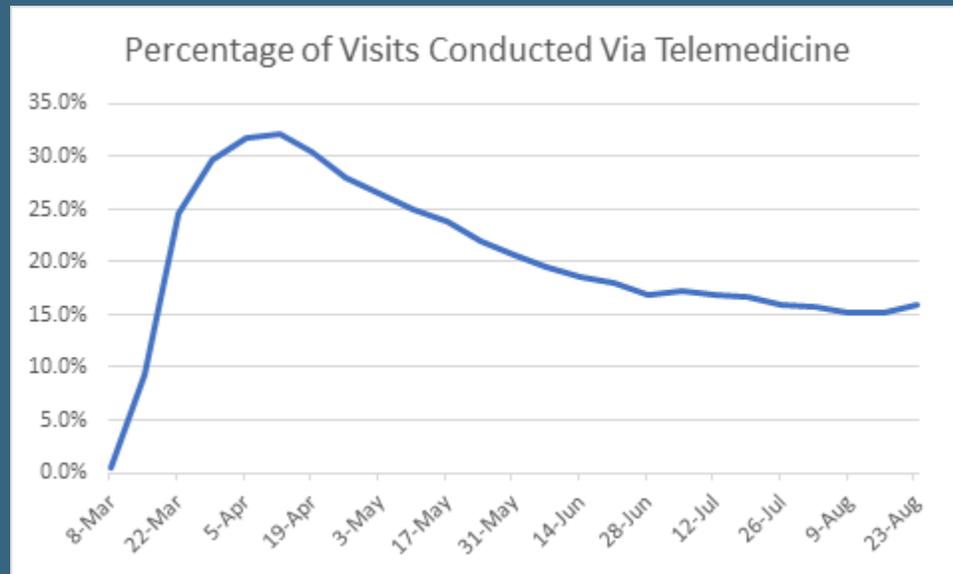
Requires reimbursement for telemedicine services at the same rate as in-person services (payment parity)

# Evaluation

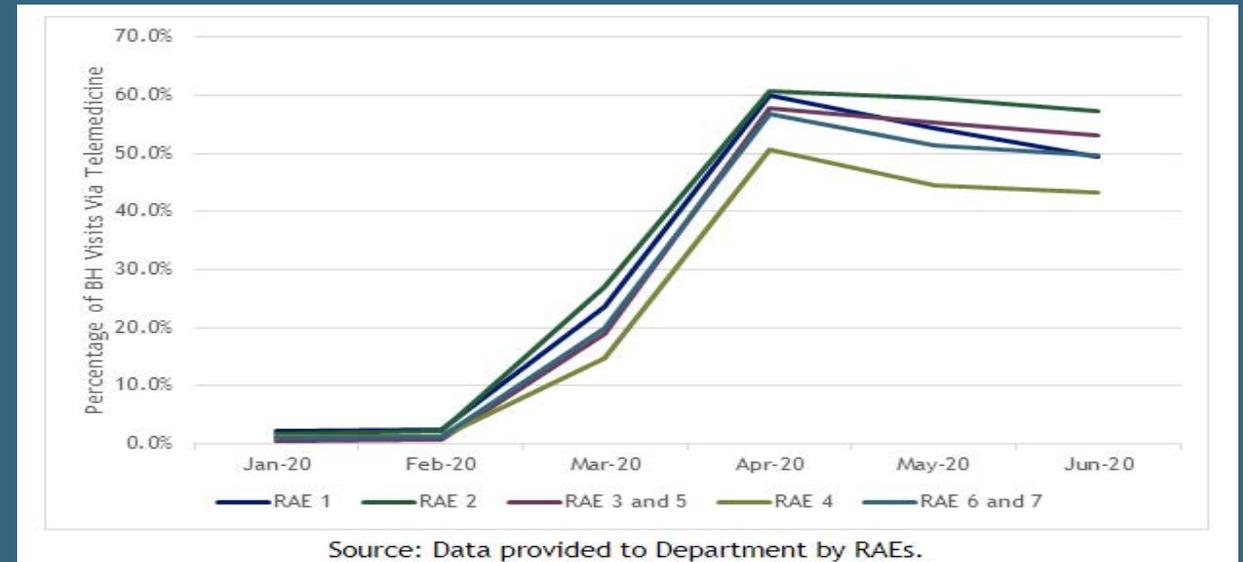


- Literature Review
- Commissioned Research
- Stakeholder Conversations
- Member Survey Analysis
- Utilization Data Analysis
- Cost & Budget Modeling
- Collaboratives

# Telemedicine Growth in FFS & Capitated BH Services



Percentage of Visits Conducted Via Telemedicine as a Percentage of All Telemedicine-Eligible Visits, March - August 2020



Percentage of Capitated Behavioral Health Visits Conducted Via Telemedicine, January through June 2020

# Who is Using Telemedicine ?



Children - therapies are key driver of utilization



Adults - top diagnoses: opioid dependence, generalized depression and anxiety\* and chronic disease management



Adults with Disabilities (waiver populations) - telemedicine is most commonly used for chronic disease management



# Who is Using Telemedicine ?



Urban utilization has been greater than rural for both medical and behavioral health diagnoses



ED trends are changing significantly with decrease in visits in all groups and some evidence of services shifting to telemedicine (ear infections for children)

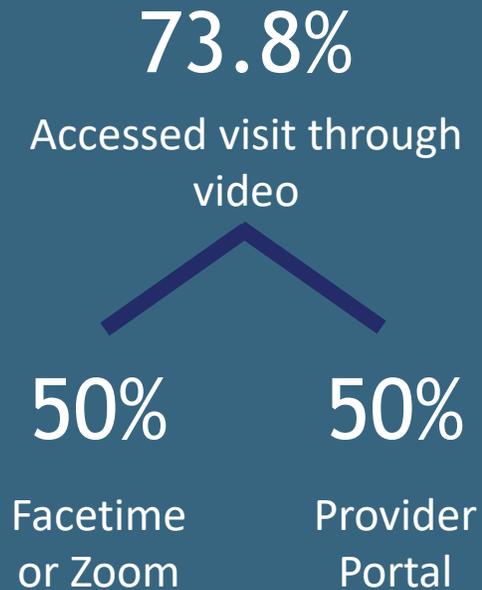
# Health Equity Findings

## Considerations and barriers include:

- Rural / Urban digital divide
- Ability to access and navigate technology
- Age
- Language
- Cultural competency
- Disabilities
- Homelessness



# Member Survey Highlights

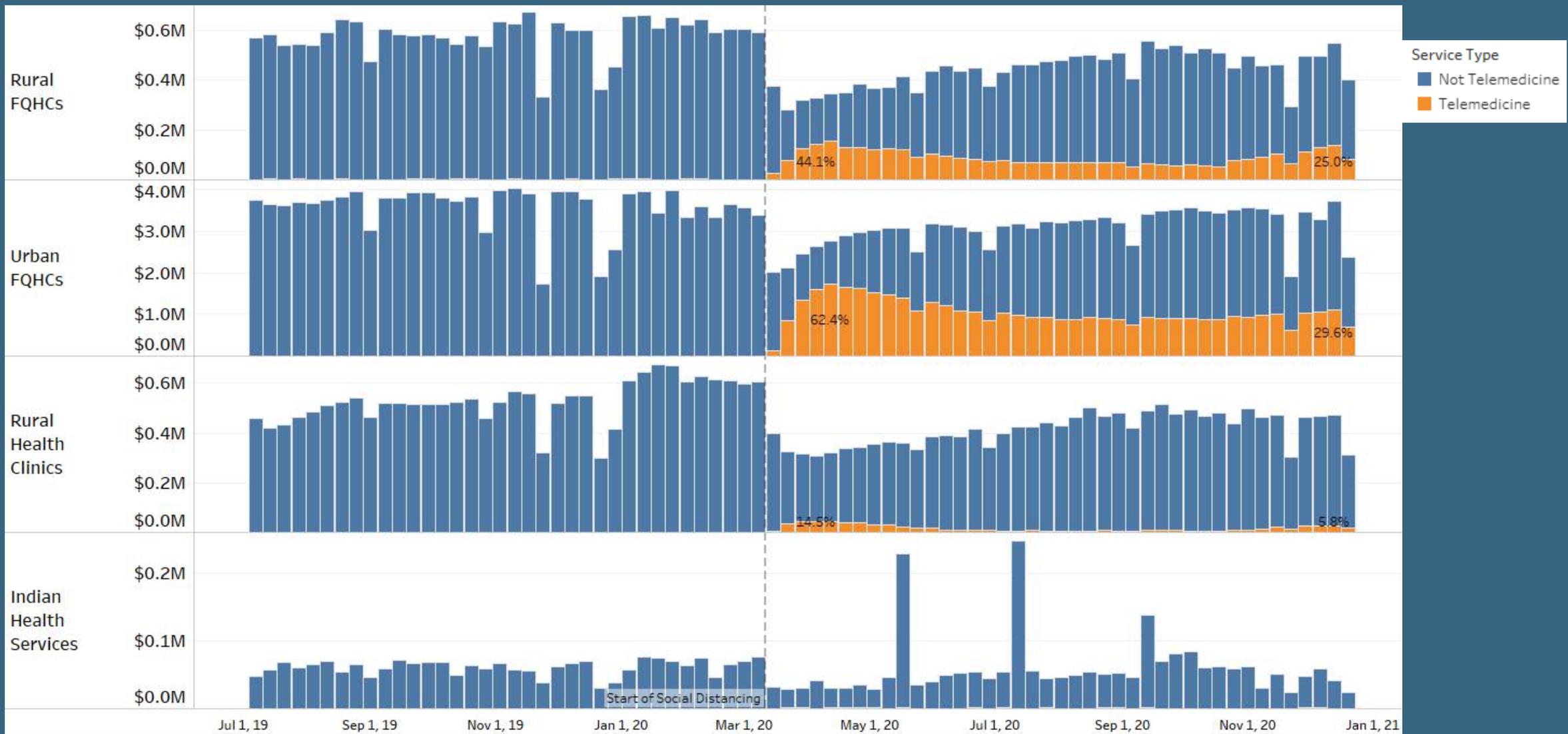


84.3%  
Said that the telemedicine visit either completely or mostly met their needs in terms of helping them with the medical care, advice, or service they were seeking

When asked what they would do if a telemedicine visit were not available,

69.1%  
of respondents said they would have delayed getting care and

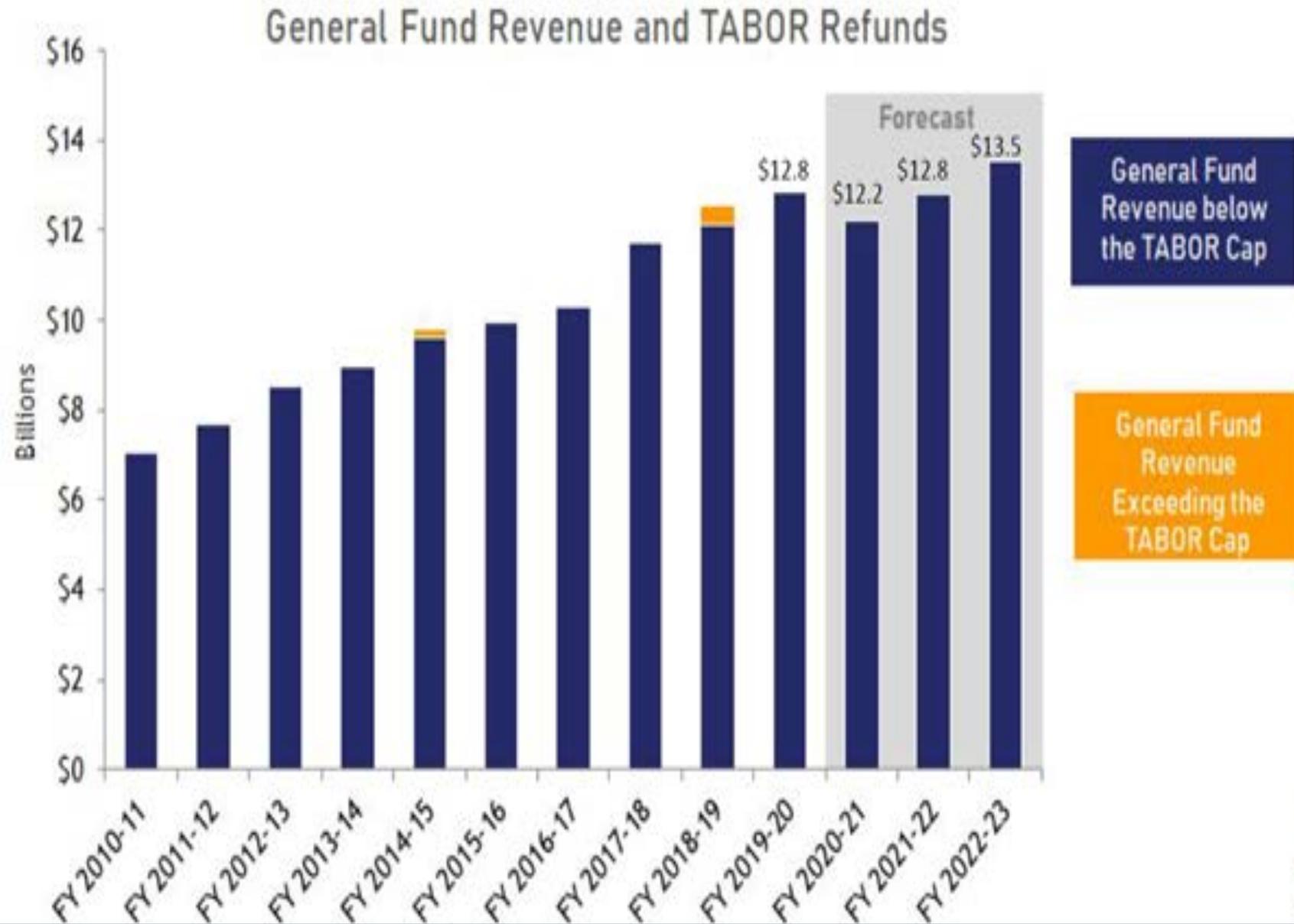
9.6%  
said they would have gone to the emergency department.



Note: Includes fee-for-service professional, outpatient, and dental services provided by listed provider type. IHS and dental services data is incomplete due to data issues. Data shows service dates from 7/7/19 through 12/26/20. Bars are the weekly paid amount with IBNR adjustment. IBNR adjustment is less accurate the more recent the week. These are estimates only. Changes in provider billing patterns would make the estimates less accurate. Rural and Urban county designation was made based on provider county. For outpatient services, only outpatient claim lines with the 'GT' modifier or with a telemedicine-specific procedure code were identified as telemedicine. Due to the fact that outpatient crossover paid amounts are only available at the claim header level, the header level paid amount has been distributed evenly among each claim line for the purposes of reporting paid amounts at the line level. This methodology may not be an accurate reflection of the actual distribution of costs among outpatient crossover claim lines.

# Budget Implications

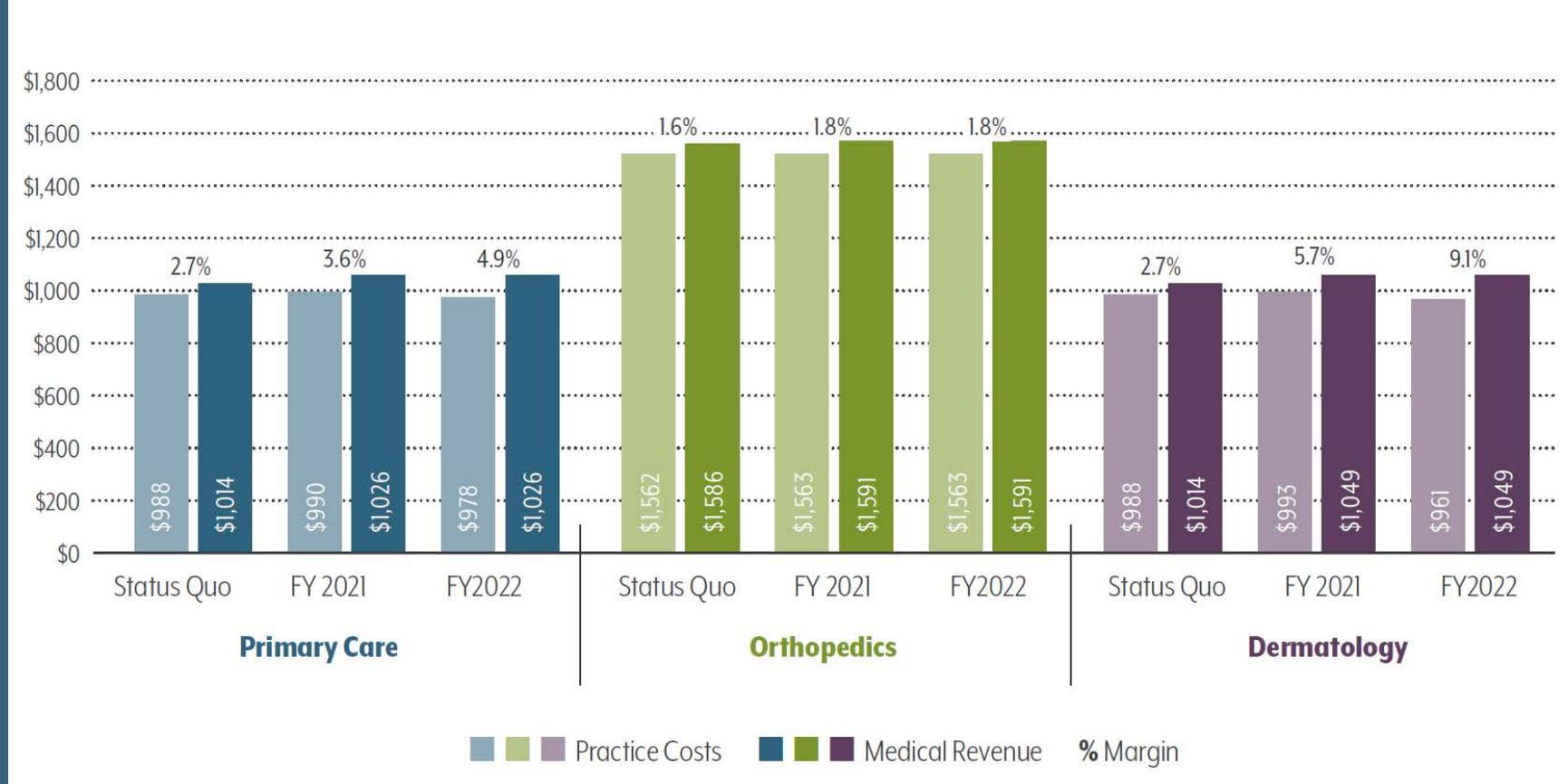
- Projected Telemedicine Spend
- FY20-21: \$210m
- FY20-22: \$253m



# Cost Modeling: Telemedicine Uptake and Impact on Future Margins

**Figure 1. Margins Increase With Telemedicine Adoption**

Average Costs, Revenue, and Margin by Provider Type (Average Per Provider FTE, in Thousands)



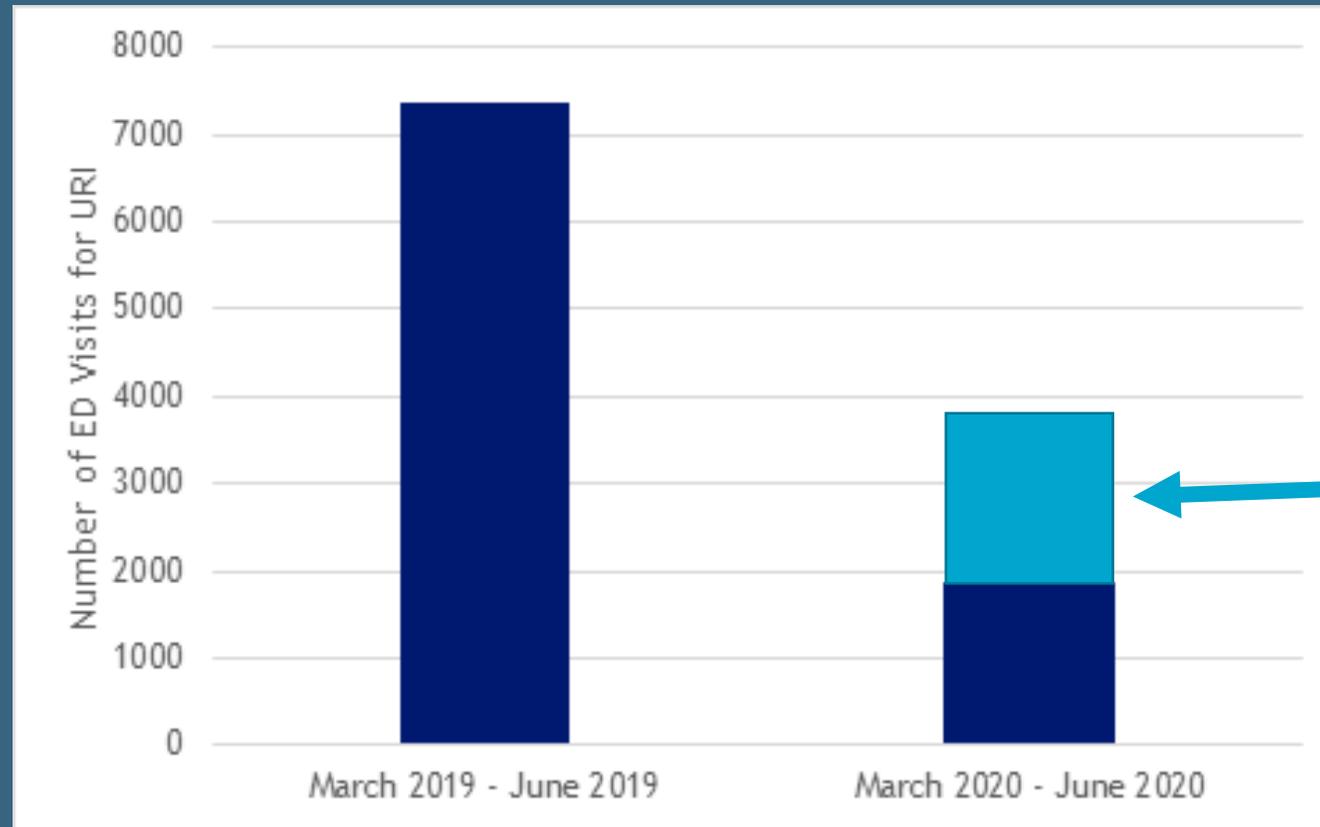
Source: Colorado Health Institute

# Emergency Department Trends

Number of ED Visits for Pediatric Upper Respiratory Infection, March - June 2019 vs 2020

## Service Type

- Telemedicine Visit
- ED Visit



**1,917**  
telemedicine  
visits for  
pediatric upper  
respiratory  
infection since  
March 2020

Source: Colorado Department of Health Care Policy & Financing, Claims Analysis



# Next Steps

- Distinguish emergency-only & permanent policies
- Retain medical home model integrity
- Build eConsult capability
- Monitor utilization
- Align payment policy

# Resources

Telemedicine Evaluation Report	TBD
<a href="http://www.colorado.gov/pacific/hcpf/stakeholder-telemedicine">Stakeholder resource page</a>	<a href="http://www.colorado.gov/pacific/hcpf/stakeholder-telemedicine">www.colorado.gov/pacific/hcpf/stakeholder-telemedicine</a>
<a href="https://forms.gle/EJGBT4SaTsRPVSvD8">Feedback form</a>	<a href="https://forms.gle/EJGBT4SaTsRPVSvD8">https://forms.gle/EJGBT4SaTsRPVSvD8</a>
<a href="https://www.colorado.gov/pacific/hcpf/provider-telemedicine#TeleUtDa">Utilization data</a>	<a href="https://www.colorado.gov/pacific/hcpf/provider-telemedicine#TeleUtDa">https://www.colorado.gov/pacific/hcpf/provider-telemedicine#TeleUtDa</a>
<a href="http://www.colorado.gov/hcpf/billing-manuals">Telemedicine Billing Manual</a>	<a href="http://www.colorado.gov/hcpf/billing-manuals">www.colorado.gov/hcpf/billing-manuals</a>

# Questions for Colorado?

*Please submit questions using the Q&A function.*

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# Telehealth in Oregon Medicaid: The Path Forward

Lori Coyner, Medicaid Director

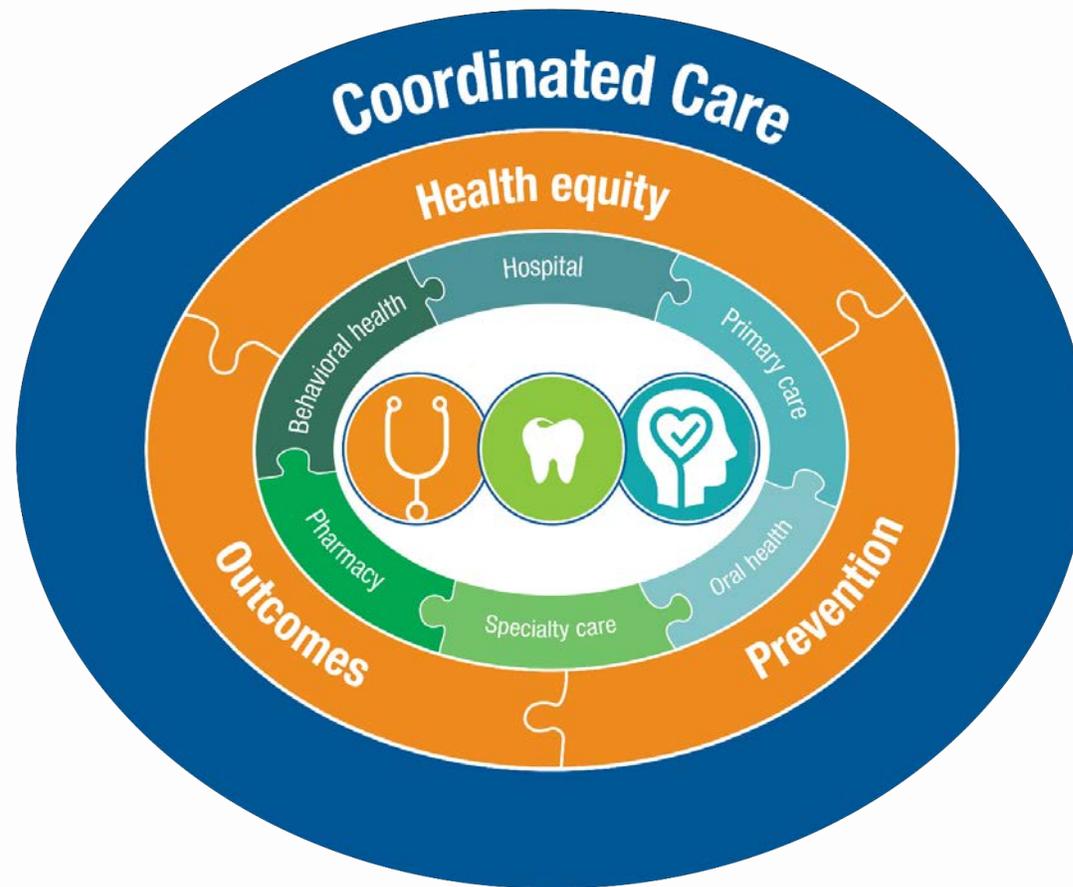
February 5, 2021



# OREGON HEALTH PLAN

# Oregon's Vision

*A patient-centered system that treats the whole person and focuses on health not just health care.*



# OHA created CCOs in 2012 to improve care delivery in the Oregon Health Plan



**Improve health**



**Reduce waste and costs**



**Create local accountability**



**Align financial incentives**



**Pay for better quality and better health**



**Coordinate care**



**Maintain sustainable spending**



**Measure performance**

# Health 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:

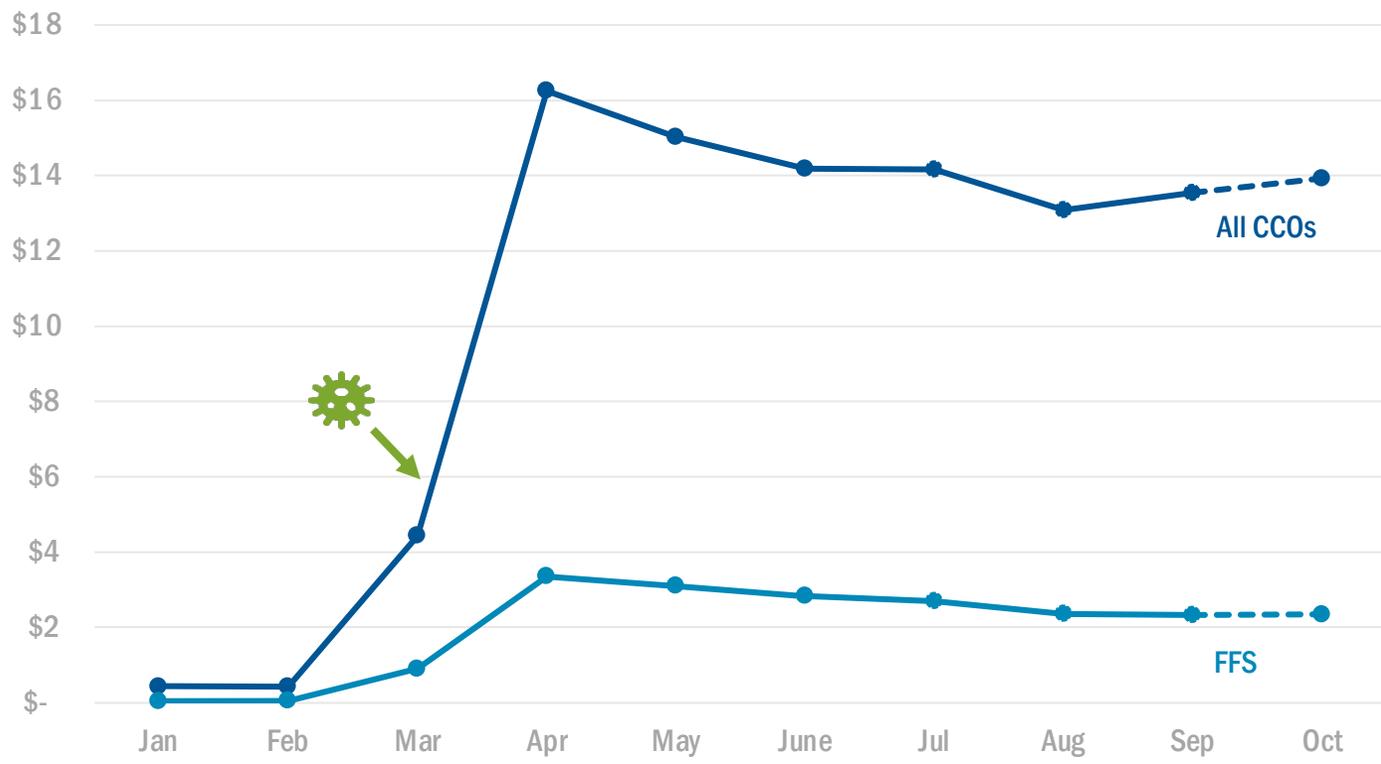
- Medicaid
- Children's Health Insurance Program (CHIP)
- Cover All Kids
- Reproductive Health Equity Act (RHEA)
- Other related services



# TELEHEALTH AND COVID-19

# Telehealth visits in the Oregon Health Plan peaked in April, and remain high

Figures are in millions  
Data source: MMIS



\*Note: Data reflect claims and encounters submitted to OHA as of 01/10/2021. Data are incomplete, especially for the most recent month.

# Telehealth expansion supported by rapid policy change

Temporary policy changes in Oregon with new flexibilities:

- ***Oregon Health Plan***: Increased coverage and reimbursement
- ***Voluntary agreements*** with major commercial health insurers
- ***Licensing boards*** eased regulations on out-of-state providers

# Behavioral health visits are more common

Top Five most Frequent Diagnoses among CCO claims: January – December 2020					
Behavior Health Diagnosis			Physical Health Diagnosis		
Primary Diagnosis	Primary Diagnosis Desc	Count	Primary Diagnosis	Primary Diagnosis Desc	Count
F1120	Opioid dependence, uncomplicated	191,690	I10	Essential (primary) hypertension	13,157
F4310	Post-traumatic stress disorder, unspecified	170,443	Z20828	Contact w and exposure to other viral communicable diseases	9,633
F411	Generalized anxiety disorder	122,133	E119	Type 2 diabetes mellitus without complications	9,350
F1020	Alcohol dependence, uncomplicated	81,349	G4733	Obstructive sleep apnea (adult) (pediatric)	7,929
F1520	Other stimulant dependence, uncomplicated	71,906	R05	Cough	7,294

# Moving toward permanent telehealth policy

- OHA developed general permanent rules for FFS and CCOs in fall of 2020
  - Involved stakeholder advisory committee and public comment
- New permanent\* rules effective January 2021
- Covered services on Oregon’s “prioritized list”

Flexibilities during the Public Health Emergency declaration	Permanent* policies
Enabling providers to deliver telehealth services from their own home and to patients in their own homes	Continue
Covering telehealth service delivery to new patients (as opposed to only when there is an existing provider-patient relationship)	Continue
Payment Parity - using the same payments rates for telehealth visits as with in-person visits	Continue, requires modifiers to distinguish video from audio-only services

\* Likely to have future regulatory updates as data improves and federal and state policy settles

# THE FUTURE OF TELEHEALTH IN OREGON

# Three principles for moving forward with telehealth

1. Center equity
2. Better understand what is working... and what isn't
3. Coordinate and align within and across payers



# Center equity: Access to interpreters

## In Oregon:



More than 1 in 7 speaks a non-English language



Nearly 1 in 20 has a hearing disability and needs sign language interpretation

Source: 2018 American Community Survey

**Goal:** Ensure access to certified and qualified interpreters for telehealth visits

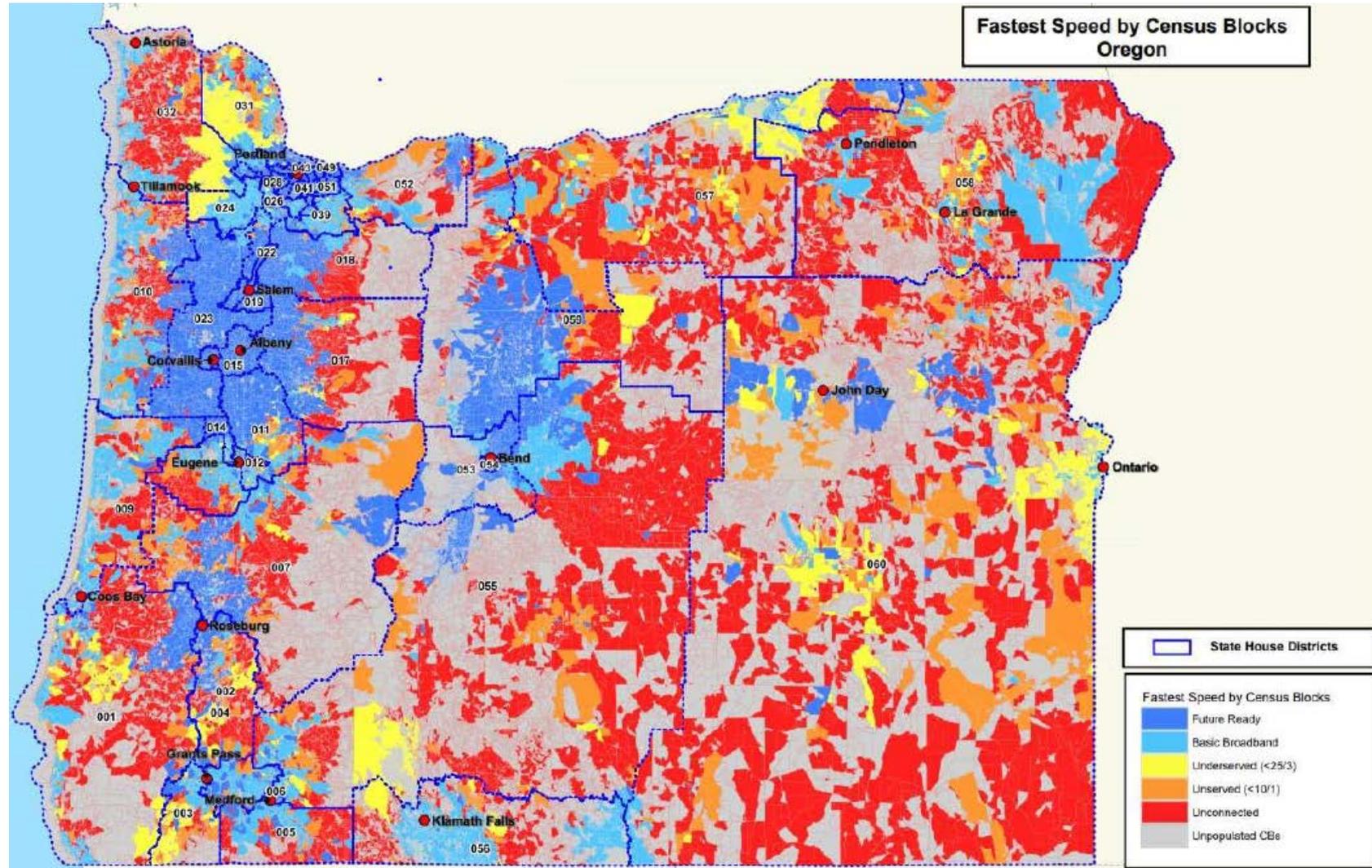
### What we heard:

- Some members struggled to find a qualified interpreter for telehealth
- Interpreter payments down during the pandemic, threatening the workforce

### What we did:

- CCOs and providers must reimburse interpreters at the same rate for services as if provided in person
- Required meaningful access to qualified and certified interpreters, including for patient consent
- New CCO incentive metric focused on meaningful language access

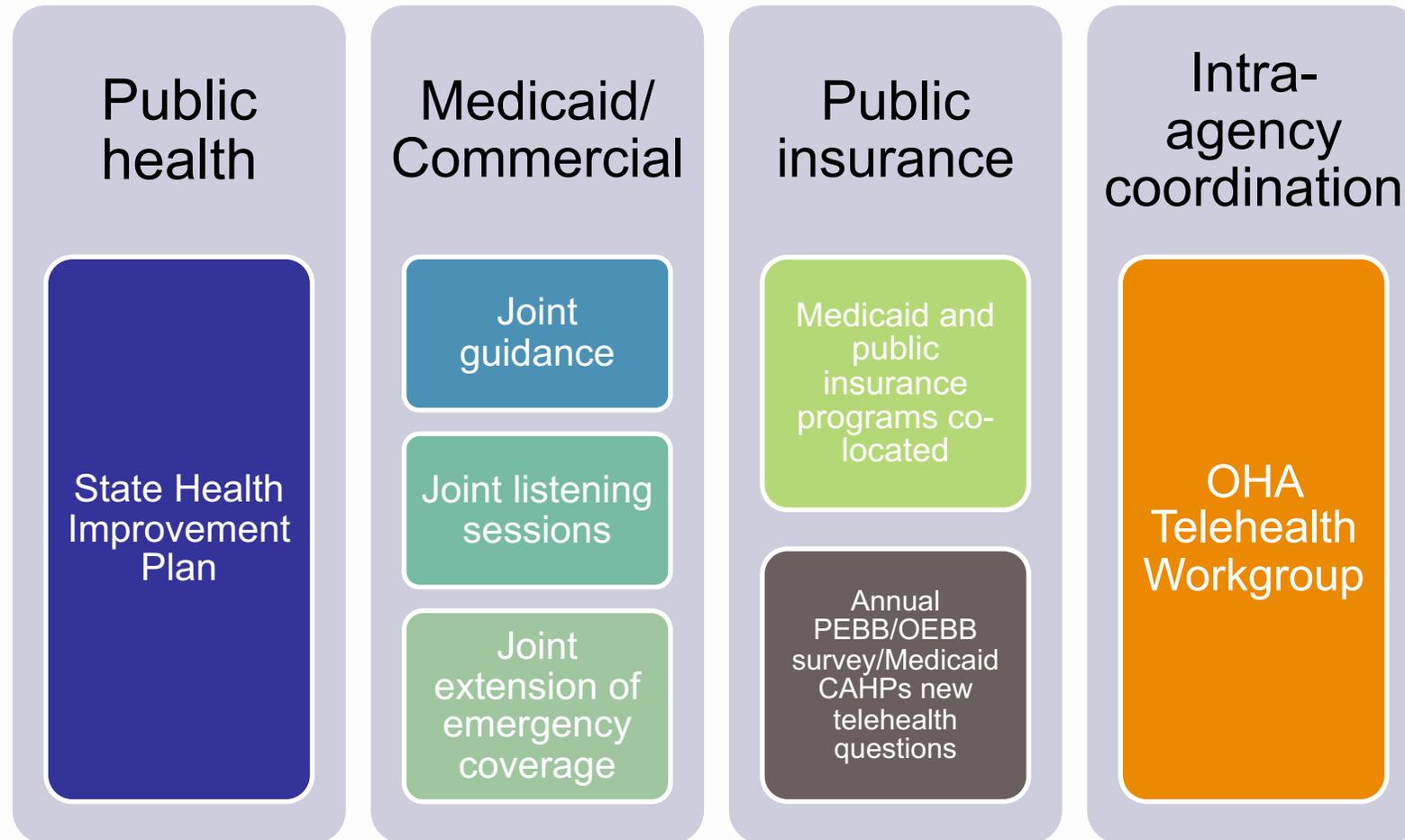
# Center equity: Access to broadband



# Better understand what is working...and what isn't

- Closely monitor the data we have
- Continue engaging community partners and members
- Expand our understanding with new data
  - **New** telehealth questions in the Consumer Assessment of Healthcare Providers and Systems (CAHPS®) and the Oregon Health Insurance Survey (OHIS)
  - **New** telehealth questions in provider workforce surveys, including traditional health workers and health care interpreters
  - Evaluate aspects of telehealth with the Multi-State Collaborative states: California, Colorado, Nevada, and Washington

# Coordinate and align within and across payers



# Resources

- FFS telehealth rule [OAR 410-120-1990](#); CCO telehealth rule [OAR 410-141-3566](#)
- Health Evidence Review Commission (HERC) [Current Prioritized List](#) (updated Oct 2020)
- [Oregon Medicaid COVID-19 Provider Guide](#)
- [Public Health Recommendations for Community Behavioral Health Services](#) (OHA provider resource)

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**Thank You!**

**Health**  
Oregon  
Authority

# Questions for Oregon?

*Please submit questions using the Q&A function.*

# Panel Q&A

*Please submit questions using the Q&A function.*

# Webinar Recordings and Resources

The screenshot shows the CCHP website's search results page. At the top, there is a navigation bar with the CCHP logo and links for ABOUT, TELEHEALTH POLICY, PROJECTS, RESOURCES, and CONTACT. A search bar is located on the right side of the navigation bar. Below the navigation bar, the page title is 'Resources Results'. The main content area shows '14 Resource Results'. The first result is a video titled 'VIDEO: Current Status of Federal and California Telehealth Policy During COVID-19', dated December 15, 2020. The video description states: 'CCHP's executive director reviews the current status of telehealth policy in 2020 and what lies ahead. View the slides of the presentation here.' The second result is a video titled 'VIDEO: CCHP Animated Video on Telehealth Reimbursement Basics', dated December 11, 2020. The video description states: 'CCHP knows that telehealth policy is complicated, especially when it comes to the way that reimbursement...'. On the right side of the search results, there is a search bar with the placeholder text 'ENTER A SEARCH TERM...'. Below the search bar is a 'Filter Resource Results' section with several checkboxes: Bill Analysis, Fact Sheet, Legislative / Regulatory Update, News, Newsletter, Report, Publication & Policy Brief, and Video (which is checked). There is a '> CITE CCHP' button next to the checkboxes and a 'GO' button at the bottom of the filter section.

Subscribe to CCHP's email listserv or stay tuned to CCHP's resources page for recordings of this webinar and presentation slide decks!

Click [here](#) to access CCHP's resources page for this webinar.

<https://www.cchpca.org/resources/search-telehealth-resources>

Stay tuned for more information on the Spring series!



# Thank You!



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