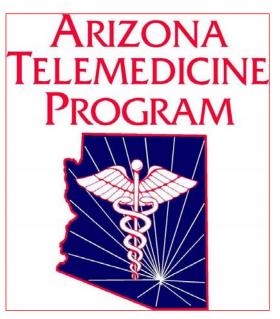
# Building a Successful Telemedicine Program

Ronald S. Weinstein, MD Founding Director, Arizona Telemedicine Program



First Telemedicine Case
Massachusetts General Hospital
April 21, 1968



- Warren Street Clinic (Tucson)
- T-Health Institute (Phoenix)
- Southwest Telehealth Resource Center (SWTRC)

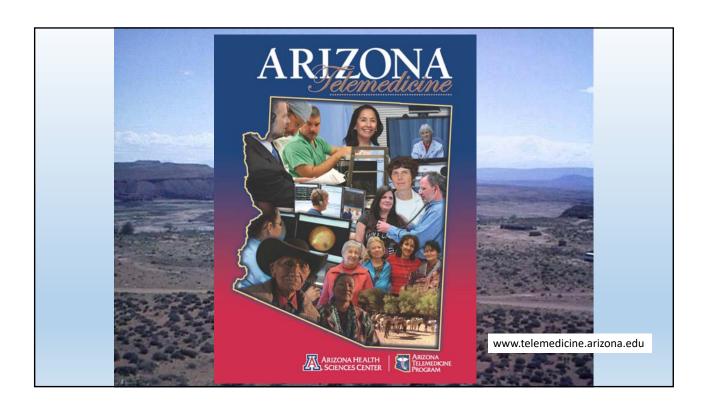
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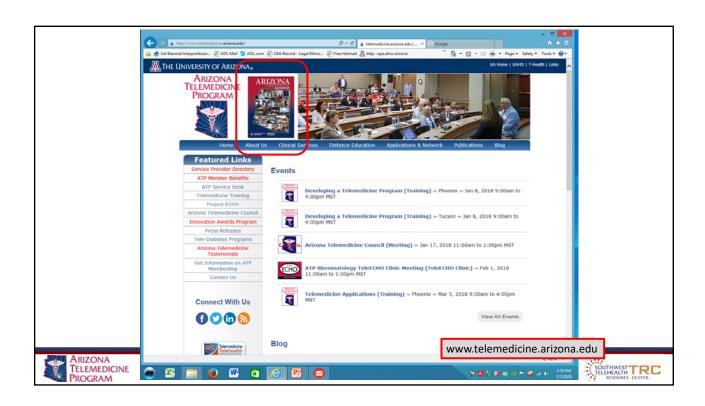
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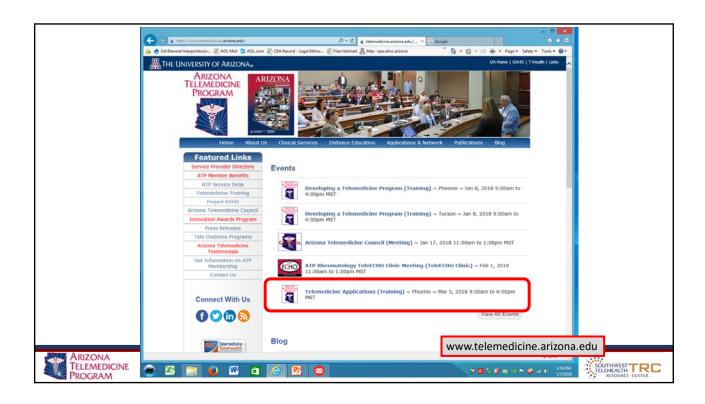


#### Telemedicine/Telehealth Applications

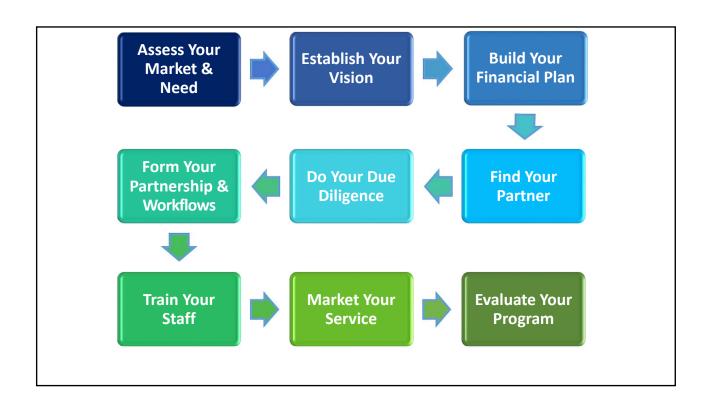
- Teleradiology
- Telecardiology
- Teleopththamology (diabetes screening)
- Telepsychiatry
- Teledermatology
- E-ICU
- In-home telemonitoring
- others 65+ subspecialties













# Involve Stakeholders in All Phases of Decisionmaking

- Internal stakeholders:
  - Administrators & business office
  - Clinical (all healthcare professionals, not just physicians)
  - Support staff (e.g., case coordinators)
  - IT
  - Legal
- External stakeholders:
  - Patients & patient groups/representatives
  - Other healthcare providers (e.g., local medicine man)

#### What Is Needed in Your Community?

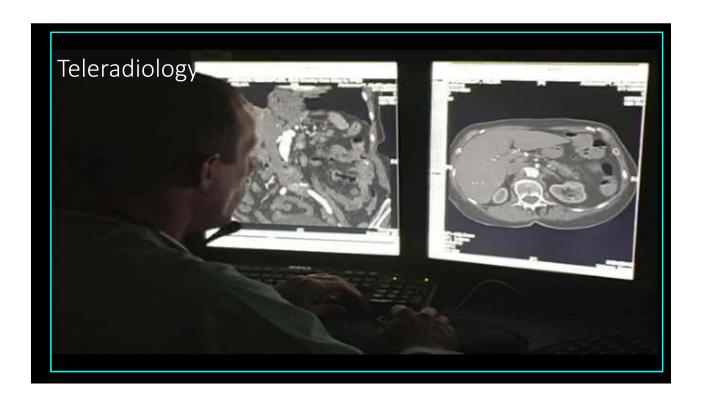
- Look at patient data & outcomes (e.g., # diabetics, # diagnosed with late stage diabetic retinopathy)
  - For your community
  - For your hospital/system
- Look at local physician coverage gaps (e.g., ? no neurologists)
- What healthcare services are patients having to travel or be transported for?
- Look at regulations (e.g., penalties for readmission)

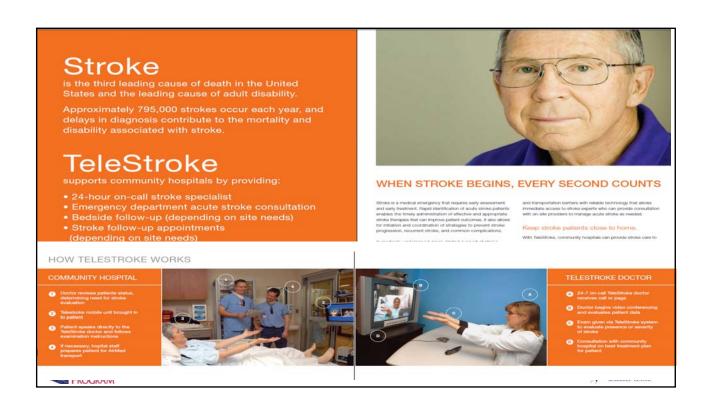
#### How Will Telemedicine Tie into Your Practice?

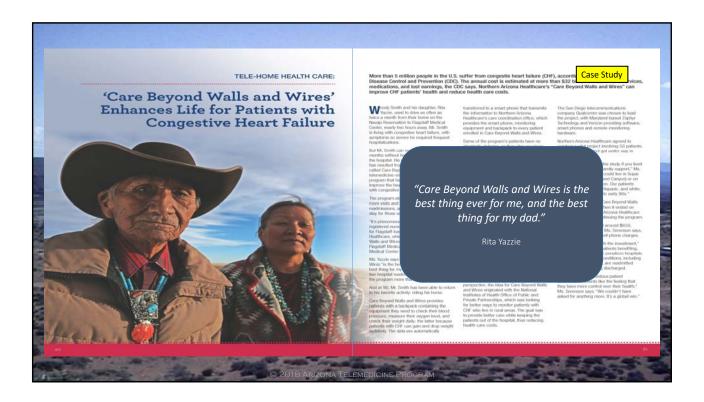
- Complement/expand your clinical offerings or substitute when your providers are unavailable?
- What specialty services?
- What hours will telemedicine be offered?
- Personnel requirements?
- What are service goals? Provider-patient? Provider-provider?
- Where are you connecting? Provider office? Telemedicine clinic? Patient home?

#### How Will Telemedicine Tie into Your Practice?

- Recommended approach:
  - Choose one or two of the most important services and start with them
    - · Don't take on too much at one time
  - Expand upon initial service; build program incrementally
    - Figure out process for integrating 1-2 services effectively & efficiently, then expand
- "Tele-everything" Disaster!







#### Reasons to Partner with a Service Provider

- Capability to deliver clinical services without interruption
  - Recruit & retain practitioners
  - Large networks of credentialed healthcare providers
- Partner can handle back-office functions (reports and billing)
- Partner can manage or co-manage program
- Experience/expertise
- Support
  - Help desk

- Administrative
- Legal & regulatory
- Marketing

• IT

# **Establish Your Vision**

Establish a Vision Aligned with Your Mission

**Establish a Vision of the Delivery Model** 

# Establish a Vision Aligned with Your Mission

- Vision statement: Define the optimal desired future state; provide guidance & inspiration
  - "Our vision is to fully incorporate telehealth technologies into the routine business and practices for the provision of health care in our County and throughout Arizona."
- Mission statement: Identify and understand the objective(s) the telemedicine service will accomplish – what it does, who does it, how it does what it does
  - "Our mission is to improve the health of citizens in our county through the development and evaluation of innovative health care and education services supported by health information technologies."

**Establish Your Vision** 

**Reality Testing** 

# The Physician-Patient Relationship

- Generally, once a physician affirmatively acts in a patient's case by examining, diagnosing, treating, or agreeing to do so, and the patient accepts, a relationship exists
- Must establish an appropriate physician-patient relationship in order to prescribe



# Know the Legal and Regulatory Landscape

 All the laws still apply regardless of whether it's inperson or via telemedicine: HIPAA, privacy & security, licensing, anti-kickback, liability, standard of care.



#### Know the Legal and Regulatory Landscape

- Informed consent & education:
  - Mitigates risk
  - Informed consent is required by AZ law
    - For Behavioral Health under AHCCCS (administered by ADHS/DBHS) informed consent must be obtained by at least 1 year BH experience—also, separate informed consent required for recording a video session.
  - Even if informed consent not required, should educate patient about unique aspects of telemedicine compared to traditional visit
- Arizona does not require an in-person exam to establish Provider-Patient Relationship: Video technology must be adequate to conduct history and physical exam remotely
- Medicare also allows video substitute for in-person exam

#### Stark & Anti-Kickback Statutes

- Stark Law prohibits physicians from referring patients for designated health services to an entity with which the physician has a financial relationship.
- AKS prohibits offering or soliciting anything of value, directly or indirectly, in return for patient referrals.
- Telemedicine may be subject to fraud and abuse laws if the use directly or indirectly generates reimbursement from a federal health program.
- Equipment leases or the provision of free telemedicine equipment to referral sources should be evaluated under fraud and abuse laws.

# Credentialing & Privileging of Tele-providers

- CMS Proxy Credentialing Rule:
  - Allows medical staff of hospital where patient is being treated via telemedicine to rely on the credentialing and privileging done at the Medicare-certified hospital where the telemedicine practitioner is located and credentialed
  - Written agreement required
  - Streamlined: Obtaining medical staff privileges at a hospital takes 2-3 months
  - May require hospital bylaw amendment
- Or, retain complete credentialing of all telemedicine providers using existing credentialing process

Build Your Financial Plan

#### **Build Your Financial Plan**

- Return on investment
  - Savings
  - Revenue
  - Strategic contribution
  - Penalty avoidance
- Payment for services
  - Subscription
  - Fee-for-service
  - Direct from patient
  - Who will do the billing?

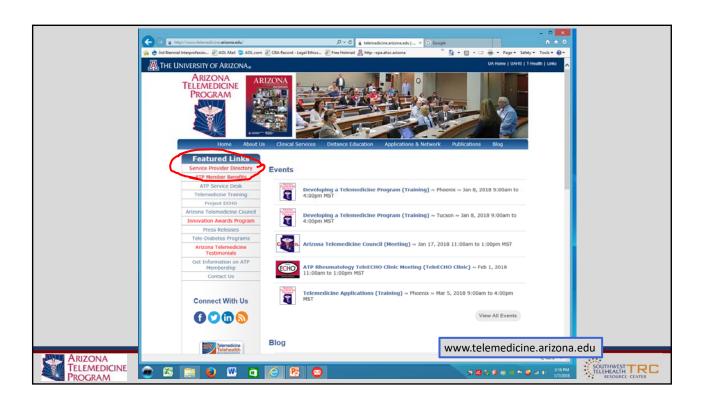


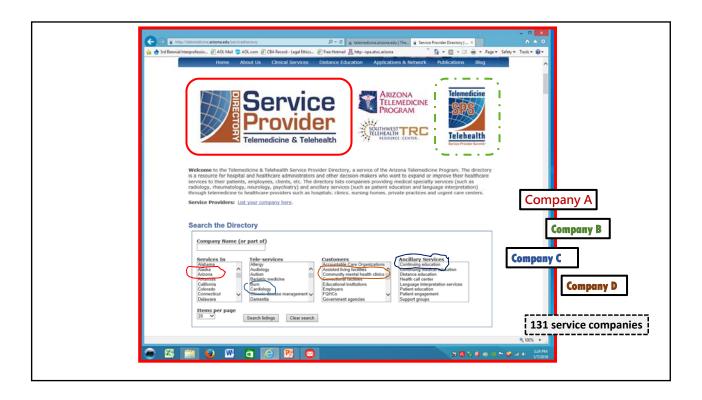
Find the Right Partner(s)

#### Where to Look for Service Providers

- ATP National "Telemedicine & Telehealth Service Provider Directory"
  - Focused on clinical & ancillary service providers <u>only</u> (not platform vendors or consultants)
  - · Offers detailed filters and comparisons







#### Questions to Start With

- Does their history and implementation plan sync with your organization and goals (mission & vision)?
- Number of years in telehealth business
  - If they're a startup, who are their investors and how committed are they?
  - Who are their customers? Will they provide references?
- How strong is their management team?
  - Expertise and experience
  - Healthcare experience or only IT and technical?
- Where are the located headquarters, providers, tech support?

#### Past Performance

- Number of sites potential partner has taken live
- Number of customers past & present
- How many telemedicine cases have they done? What kind?
- What is their growth rate?
- Can they provide data to back up their claims?
  - Clinical
  - Financial

#### Questions to Start With

- Do they have experience with the coverage and capability you need?
  - · Hours of availability
  - · Wait times for consults
- Are they willing to work with your organization's size and number of consultations?
- Do they have a robust implementation plan?
  - In writing
  - · Proven, battle-tested

#### How Strong is their Clinical Team?

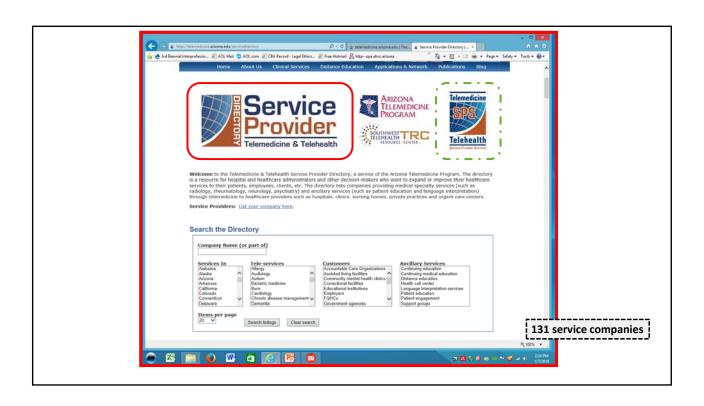
- Number of physicians/providers in the specialty you need, at the level you need (# and qualifications), and licensed in Arizona (or your state)
- Clinical experience, training, degrees, board certification, lawsuits
- If academic institution: faculty, fellows or residents?
- How strong is their clinical team?

# What Technology Platform Do They Use?

- How strong is their platform?
  - Does it meet standards?
  - FDA-approved devices?
  - HIPAA compliant?
  - Reliable, easy to use? How many clicks/how much training is required?
  - What is the failure rate?
  - Interoperability?
  - Connections to EHRs? PACS? Does it work with your EHR and your PACS? Costs to integrate?
- Or, will they use whatever platform you provide?



# Find the Right Partner(s)



# Telemedicine & Telehealth Service Provider Summit

October 8-9, 2018

Glendale, Arizona



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# Due Diligence, Documentation & Your Contract

# Due Diligence: Background Check

- Do they have proper licensure, etc.?
- What is their malpractice history and insurance?
- Do they have third-party credentials (e.g., <u>Joint Commission</u>, <u>American Telemedicine Association</u>, <u>Office of the National</u> Coordinator for Health Information Technology certified HIT)?
- What is their BBB rating?
- Have they had trouble with IRS?
- Have they been in trouble with medical organizations?
- Have there been lawsuits against them?

# Due Diligence: References

- Request a customer list/references and contact them
  - Are you happy with this company?
  - What have they provided to you?
  - · What have your challenges been with this company?
- Find and interview customers not given as references
  - · Search the web
  - Go to trade shows & conferences
  - · Look for user groups

#### The Contract

- Ensure they have appropriate medical malpractice insurance, liability insurance
- Who will own the data? What data? Who will have rights to retain copies of the data? To license it, to sell it? For how long?
- Who will be responsible for continuity of care?
- Consider annually renewable contract
- Cover expansion

Form Your Partnership & Integrate Telemedicine into Your Workflows

# Form a Partnership

- Telemedicine service programs are not one-sided, turnkey programs
- Requires effort on both sides:
  - putting together a program and educating at the user end
  - integrating workflows
- <u>Collaborate</u> with partner on what program will look like; form unity of vision for what you are trying to accomplish

# Recognize You Are Changing the Status Quo

- Identify and leverage the proponents/champions: CMO, CNO tend to be important sponsors
- Identify and embrace the outliers: Reach out, make them part of the process, hear and address their concerns
  - e.g., "Big Brother": eICU does not mean you are being watched 24/7; just that trends are being identified that need your attention
  - e.g., Will I have to become a technical expert?
  - e.g., Will my patients receive care as good as in person?

## Agree on an Implementation Timeline

- Technical implementation is not what takes time
- Most time is spent working with the staff:
  - ensure messaging and impact is well understood
  - invaluable for successful implementation and ongoing relationship
  - Make sure everyone (not just providers) is trained
- Don't rush
- Try some dry runs with simulated patients before doing any actual cases

# Communicate Internally & With Partner

- Project goals and plan, team members
- Site review by partner
- Tele-providers need to respect the pre-existing relationships and transfer arrangements in the community
- Reasonable and measurable expectations
- Trackable & well-defined metrics to measure telemedicine progress
- Standards and guidelines to be used for this service

#### Standards and Guidelines

- ATA Practice Guidelines:
  - Multiple specialties including telepathology, teleICU, telemental health, teledermatology, telerehabilitation, home telehealth, diabetic retinopathy
  - Also primary and urgent care, telepresenting, and core operational guidelines
  - Remote healthcare data management
  - others

# Train Your Providers & Staff

#### **Train Your Providers & Staff**

- Telemedicine is an integrated component of your institution or practice and should be part of the normal position expectations
- Determine who needs to be trained (usually everyone)
- Determine content & extent of training needed for each position involved
- Determine how to provide the training & how often (for new users as well as refresher training)
- Evaluate training results

Market Your Service

# Marketing Internally

- Let people & stakeholders know what your results are
  - Consult numbers
  - Patient outcomes
  - Patient satisfaction
  - Staff satisfaction
- This is a team process; be transparent
- Invite input/suggestions
- Tell them in more than one way (meetings, website, emails, etc.)

# Marketing Externally

- Let your community know there is a new service available
  - Press release
  - PSA
  - Website and web content marketing (SEO)
  - · Blog with email updates/sign-up
  - Letter to patients
  - Success stories
  - Social media
- Cite partner experience & successes

# **Evaluate Your Program**

#### **Evaluation: How to Start**

- View transition on a relative basis:
  - Have we improved?
  - In what ways?
  - To what extent?
- Use measurable, objective data choose metrics in advance
- What are you concerned with?

#### What to Measure

- Patient-centered outcomes (e.g., clinical markers, reduced hospital stays)
- Provider-centered outcomes (e.g., diagnostic accuracy, efficiency & efficacy)
- Business outcomes (e.g., increased profits, reduced travel costs)
- Technical outcomes (e.g., faster network, more reliable communications, redundancy, better peripheral technology)
- Program outcomes (e.g., more sites added to network, number of consults, is the program growing)

#### **Evaluation Resources**

- Southwest Telehealth Resource Center Online Learning Module: Evaluation
- Telehealth Resource Centers Toolkits





 $https://www.mmicgroup.com/docs/brinkmagazine/2018-01FallWinter\_MMIC\_Brink\_Magazine.pdf$ 

# Licensing and Credentialing

- Are you licensed in the state where the patient is located?
- Are there local prescribing rules you need to follow?
- Are you using nursing staff, PAs, NPs, or others who also need to be licensed?
- Is there a credentialing process in place?

#### Clinician-Patient Relationship

- Are you creating a clinician-patient relationship?
- If not, is that clear to the patient?

# The Physician-Patient Relationship

- Generally, once a physician affirmatively acts in a patient's case by examining, diagnosing, treating, or agreeing to do so, and the patient accepts, a relationship exists
- Must establish an appropriate physician-patient relationship in order to prescribe





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# Standard of Care—Patient/Condition Selection

- Are you providing the same standard of care that you would in person?
- Is this patient suitable for care through telemedicine?
- Is this condition appropriate for care through telemedicine?
- Do you have a plan for an emergency situation?

# Physical Environment

- Do you have the same ability to communicate and understand as if this patient were in person?
- Is the lighting adequate on both sides of the interaction?
- · Is the video and sound quality adequate?
- Can you ensure there will be no interruptions?
- · Are you comfortable with the reliability of the technology?

#### Webside Manner

- Are you introducing yourself?
- Are you making eye contact?
- Are you presenting yourself professionally?
- Are you showing empathy and compassion on a screen?

# Privacy and Security

- Are you compliant with HIPAA?
- Are you protecting the confidentiality, integrity and security of health information?
- Do you have adequate encryption, passwords, anti-virus, and security software?
- Where are your records stored?
- Who owns your records if there is a breach?
- Are you aware of all the modalities and devices involved?

#### **Medical Records**

- How does your e-visit information get into the medical record?
- Are you documenting as much as you would in person?
- Are you documenting the mode of service and technical information?
- Are you documenting any technical problems?
- How do your patients request access to records?

# Billing

- Have you verified that you can bill for this service?
- Has your patient verified that their insurance will cover this service?

# **Professional Liability Coverage**

- Does your professional liability policy cover telemedicine?
- Does it matter where your patient is located?
- Do you need additional cyber liability coverage?

## **Informed Consent**

- Are you talking with patients about the risks and limitations of telemedicine?
- Are you sharing contingency plans for outages?
- Are you managing expectations about what can be accomplished remotely?

#### ----Ten Commandments

- Do you have acceptable policies and procedures covering telemedicine care?
- Do you have protocols for patient/condition selection and escalation of care?
- Are you tracking orders and follow-up plans?
- Do you have protocols for record-keeping?
- Are you ensuring licensure for each clinician in each state?
- Are you ensuring credentials for each clinician in your system?
- Are you ensuring appropriate billing?
- Do you have a plan for quality tracking for telemedicine encounters?
- Are you assessing patient and clinician satisfaction?
- Are you comfortable with clinician competence to use telemedicine?

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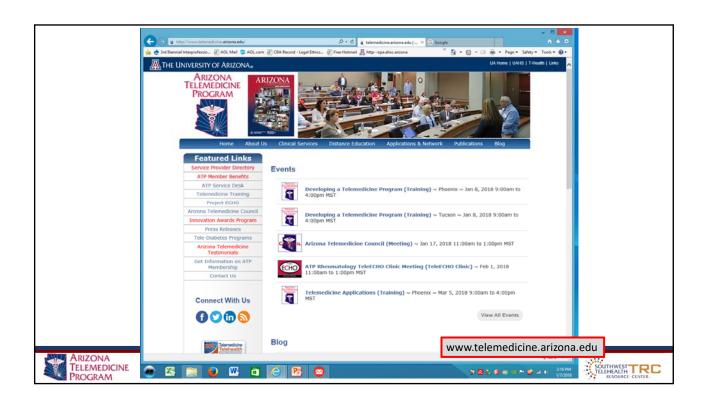
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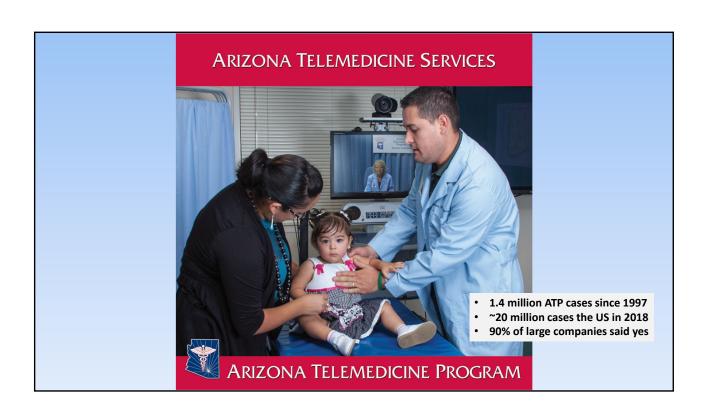
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# Thank you!

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