Compliance and TeleHealth

Julie Bell, MED
Compliance Program Manager
Objectives:

• Introduce you to Intermountain’s Compliance Program

• Identify some potential compliance risks for TeleHealth projects

• Understand that there is not a one size fits all solution for TeleHealth projects

• Identify resources you can use in building and deploying your own TeleHealth initiatives
Compliance
It is the overriding responsibility of the Corporate Compliance Department to promote an organizational culture that encourages a commitment to ethical behavior as well as compliance with applicable laws and internal policies.
elements of our COMPLIANCE PROGRAM

- Standards of Conduct, Policies & Procedures
- Board & Organizational Support
- Effective Lines of Communicating & Reporting
- Enforcement & Discipline
- Education & Training
- Risk Assessment
- Response & Prevention
- Monitoring & Auditing
Compliance and Legal Risks

- Licensure/Scope of Practice
- Privileging and Credentialing
- Coding/Charging/Billing/Reimbursement
- Documentation/The Electronic Health Record
- Medical Malpractice/Liability
- State Regulations
- TeleHealth and Prescribing
- Informed Consent
- HIPAA/Privacy/Security
- Federal Fraud and Abuse: The Anti-Kickback Statute
- Federal Fraud and Abuse: Stark Law
• Licensure
• Scope of Practice
• Interstate Compacts
Privileging and Credentialing Cont.

- Significant administrative workload to P&C every provider for TH
- The Joint Commission issued standards allowing hospitals to “privilege by proxy”.
- § 482.22 CFR Condition of Participation: Medical staff
Coding/Billing/Reimbursement

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Centers for Medicare & Medicaid Services

Medicare Learning Network

RURAL HEALTH SERIES
Telehealth Services

Please note: The information in this publication applies only to the Medicare Fee-For-Service Program (also known as Original Medicare).

The Hyperlink Table, at the end of this document, provides the complete URL for each hyperlink.

Learn about these calendar year (CY) 2017 Medicare telehealth services topics:
- Originating sites
- Distant site practitioners
- Telehealth services
- Billing and payment for professional services furnished via telehealth
- Billing and payment for the originating site facility fee
- Resources
- Lists of helpful websites and Regional Office Rural Health Coordinators

When "you" is used in this publication, we are referring to physicians or practitioners at the distant site.

Medicare pays for a limited number of Part B services furnished by a physician or practitioner to an eligible beneficiary via a telecommunications system. For eligible telehealth services, the use of a telecommunications system substitutes for an in-person encounter.

CPT only copyright 2015 American Medical Association. All rights reserved. CPT is a registered trademark of the American Medical Association. Applicable FARS/DFARS. Instructions Apply to Government Use. Fee schedules, relative value units, conversion factors and/or related components are not assigned by the AMA, are not part of CPT, and the AMA is not recommending their use. This material does not constitute or imply any CPT coding or other professional services. The AMA assumes no liability for data contained or not contained herein.

ICN 591705 November 2016
State TeleHealth Policies

State Laws and Reimbursement Policies

The Center for Connected Health Policy helps you stay informed about telehealth-related laws, regulations, and Medicaid programs. We cover current and pending laws, legislation regulations for the U.S., all fifty states and the District of Columbia.

- All Current Laws and Policies
- All Pending Legislation and Regulations
- Full Report "State Telehealth Laws and Reimbursement Policies"
• Intermountain Resources
• External Resources
Resources

1. American Telemedicine Association
2. TRC (Telehealth Resource Centers)
3. Center for Connected Health Policy
4. NRTRC (Northwest Regional Telehealth Resource Center)
National Changes

- H.R. 2550 – Medicare Telehealth Parity Act of 2017
- H.R. 2991 – Helping Expand Access to Rural Telemedicine (HEART) act of 2017
- S. 1016 Creating Opportunities Now for Necessary and Effective Care Technologies (CONNECT) for Health Act of 2017
- S. 787 Telehealth Innovation and Improvement Act of 2017
- H.R. 1148/S. 431 Furthering Access to Stroke Telemedicine Act (FAST)