

Lead^{the}Way

Telehealth

Flexibility after COVID-19 Public Health Emergency



Trinity Health is one of the largest multi-institutional Catholic health integrated care delivery systems in the nation, serving diverse communities that include more than 30 million people across 22 states. We are building a health system that puts the people we serve at the center of every behavior, action and decision. This brings to life our commitment to be a compassionate, transforming and healing presence in our communities. We advocate for public policies that support better health, better care and lower costs to ensure affordable, high quality, people-centered care for all.

Telehealth Flexibility

As part of COVID-19 relief, state leadership, Congress and the Department of Health and Human Services (HHS) have provided temporary flexibilities to make telehealth services more readily available, relaxing long-existing barriers to providing care through telehealth.

These valuable telehealth changes have offered several advantages, including keeping patients and providers safe from exposure to COVID-19, preserving personal protective equipment, and improving access to care. Further, the telehealth flexibility has allowed patients access to their existing physicians, which has been critical for patients with chronic conditions.

COVID-19 will impact how care is delivered for the foreseeable future and telehealth plays a key role in maintaining our ability to respond to the current pandemic. In addition, the positive experience Trinity Health has had with the increased adoption and expansion of telehealth across our health system makes it clear telehealth is a critical component for how we provide high quality, patient-centered care moving forward.

Unfortunately, much of the telehealth transformation is dependent on temporary flexibilities. Absent additional action from policymakers, patients stand to abruptly lose access to many telehealth services after the national emergency declaration, public health declaration and individual state flexibilities end.

What Can Policymakers Do?

Maintain telehealth flexibilities beyond the public health emergency, including:

- Allowing clinicians to furnish and bill with parity of payment for in-office visits across all payers and settings.
- Allowing telehealth visits to be reimbursed when originated within the patient's home or location of their choosing where clinically appropriate.
- Allowing clinicians to be reimbursed for telehealth when seeing new patients or a patient not previously seen at their practice.
- Removing limitations on frequency of services.
- Expanding types practitioners eligible to bill for telehealth services.
- Expanding covered services reimbursable for telehealth, while ensuring these include prescribing and behavioral health services.

Telehealth Experience

- Since the onset of COVID-19, Trinity Health telehealth video visits increased from less than 1 percent to 37 percent, with an average of 7,072 video-visits conducted per day.
- Trinity Health clinicians conducted 31,662 Medicare Annual Well Visits since the onset of COVID-19 through May, predominantly via telehealth.
- Telehealth is user friendly and provides ease of access. Patient satisfaction scores have improved with telehealth adoption from 92.5 percent to 94 percent.
- "With telehealth, consumers are quickly learning that high-caliber, well-coordinated care can be delivered at the time and location of their choosing. Telehealth services can offer both convenience and quality for a wide variety of concerns."
- Dr. Dan Weiswasser, Provider from Trinity Health New England
- "I feel fortunate that I was able to schedule a telehealth appointment with my primary care physician. [The telehealth visit] was a simple and seamless way to get high quality care. My PCP had immediate access to all my electronic medical records. I didn't feel rushed, and I felt like I got the care I needed in short order - and the resulting prescription ended up being precisely what I needed."
- Patient (who wishes to remain anonymous), Springfield, Mass.

Required Action for Permanence

Policy	Description	Needed Action*
Establish payment parity with in-office visits	Services that have different payment rates in both non-facility and facility settings are reimbursed at the facility (lower) rate when furnished via telehealth.	CMS rulemaking necessary to modify prior interpretations of the statutory payment requirement for distant site providers.
Remove originating site requirements	Certain facilities qualify for a telehealth originating site fee. In addition, Medicare requires that a beneficiary receive telehealth services at a designated health care facility or rural site (originating site).	Congressional action necessary to modify the originating site requirements.
Remove new/established patient requirement	The code descriptions of certain telehealth services specify that the service must be provided to an “established patient”. Under the relationship requirement, the patient must have seen the health care provider (or another provider in the same practice) before the telehealth visit.	CMS rulemaking necessary to change the established patient requirement.
Remove limits on frequency of services	The frequency of telehealth services is limited for certain Medicare services. Examples include services rendered in inpatient facilities and skilled nursing facilities.	CMS rulemaking necessary to remove frequency limitations.
Expand provider type	Medicare limits the type of health care providers eligible to provide telehealth services	Congressional action necessary to permanently revise or otherwise expand the list of practitioners permitted to receive Medicare reimbursement for telehealth services.
Expand covered services	Medicare provides a list of telehealth services payable under Medicare, which is updated annually.	CMS rulemaking necessary to expand covered services.

**State action required to advance these policies in Medicaid. Commercial payers should align with Medicare and Medicaid where possible and where it increases flexibility.*

Mission

We, Trinity Health, serve together in the spirit of the Gospel as a compassionate and transforming healing presence within our communities.

Core Values

Reverence • Commitment to Those Who Are Poor • Safety • Justice • Stewardship • Integrity