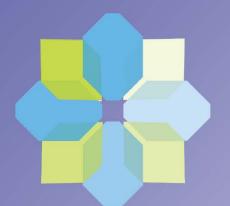
Implementing Telehealth: Getting Started

Rob Sprang, Mid-Atlantic Telehealth Resource Center Evelyn Kietlyka & Leah Coplon, Maine Family Planning Jean Smith, Richland County Health Department



2020 NFPRHA NATIONAL CONFERENCE

Objectives

- Describe key considerations and a process for researching, developing, and initiating implementation of a telehealth service.
- Review available resources to support development and implementation of a telehealth service.
- Identify next steps for their organization's telehealth activities.
- Discuss how telehealth services are currently being used in sexual and reproductive health care.

Family Planning
& Reproductive Health Association









What problem do you want to solve with telehealth?

Agenda

How to Get Started with Telehealth - Robert Sprang

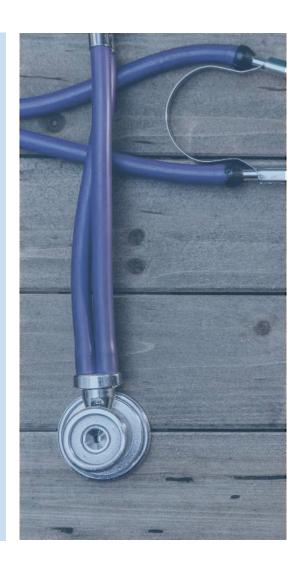
10 Minute Break (~12:35pm)

Starting Telehealth in North Dakota – Jean Smith

Implementing Telehealth: Maine Family Planning – Evelyn Kieltyka & Leah Coplon

A Conversation about Getting Started with Telehealth

Q&A





2020 National Family Planning and Reproductive Health Association National Conference (NFPRHA)

Telehealth - So what is the big deal?

Rob Sprang, MBA March 8, 2020



Agenda

- What is telehealth?
- Why consider telehealth?
- Legal and regulatory considerations What you can and can't do
- Technology
- Examples of telehealth
- What telehealth will look like in the future
- One physician's story Dr. Gregory Jicha
 - How he got started with telehealth First patient in Morehead
 - Validation study and other research
 - Educating community providers, med students and residents
 - Family caregiver "virtual support group"
- How do you get started?



What is Telehealth?



Use communications technology to;

Get the right care



To the right people

At the right time

In the right place

For the right price



Why Telehealth???

- It sure looks cool!
- It will look great on my resume
- It was on last weeks episode of New Amsterdam
- My boss keeps saying "When are we going to do telehealth?"
- We can't keep up with other practices if we don't do telehealth



Telehealth must make clinical and financial sense and fit within your strategic plan



Legal and Regulatory Considerations

- Reimbursement
- Licensure
- Privileging/Credentialing
- Privacy, confidentiality and security
- Anti-Kickback/Stark Self-referral
- Medical Malpractice/Liability
- Online Prescribing



Reimbursement

Medicare

- https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNProducts/downloads/TelehealthSrvcsfctsht.pdf
- Must be rural
- Interactive video technology
- Approved Originating Sites
- Approved Billing Codes
- Approved Distant Site Providers
- Place of Service (POS02), HCPCS Code Q3014 facility fee
- Medicare audit of 100 cases
- Medicaid/Commercial health plans State-dependent, pursue parity
- Opportunities for contract work assign billing rights



Licensure

- Place of Service is where the patient is physically located at the time of the encounter
- Provider MUST be licensed in the state where the patient is located at the time of the encounter
- Medical licensure compact expedited pathway, 29 states, https://imlcc.org/
- For Direct-to-Consumer services, should document the patient's confirmation of location (consent)



Privileging/Credentialing

- If required by the Originating Site Medical Staff
 Office, a provider must be credentialed and have privileges at the Originating Site.
- Primary Source Verification vs CMS/JC "Credentialing by Proxy"
- https://www.foley.com/en/insights/publications/2018/ 02/telemedicine-credentialing-by-proxy-whathospitals



Privacy, Confidentiality and Security

- Work with your legal office
- If you need legal advice, <u>https://www.foley.com/en/services/industry-teams/health-care/telemedicine--digital-health</u>
- Comparable diligence to maintain confidentiality as a traditional in-person visit
- HIPAA-compliant technical solution
- Consider BAA with 3rd party vendors
- Carefully crafted consent form is recommended



Anti-kickback, Stark self referral laws

- 1998 Medicare telehealth law split the professional fee between referring and consulting providers
- 2001 legislation ended fee splitting
- Avoid perception of financial influence on referral decisions
- Consider contracts with fair market valuations for Originating and Distant sites
- Avoid any financial conflicts
- There are many safe harbors
- Seek legal advice



Medical Malpractice/Liability

- Minimal legal precedent
- Provider malpractice insurance must be in force in the "place of service" state (where the patient is)
- Case DTC company did not mandate provider to be licensed in the "place of service" state
- Case Healthcare facility had telehealth and did not use it
- Seek legal advice



Online Prescribing

- 2008 Ryan Haight Act requires "valid prescription"
- Center for Connected Health Policy
 https://www.cchpca.org/telehealth-policy/online-prescribing
- 2018 HR6 Support for Patients and Communities Act requires the AG to promulgate regulations regarding any limitations for prescribing via telehealth. Primarily focused on opioid crisis. No deadline for those regs.
- Seek legal advice in your state



Technology Considerations



- Clinical need determines the technology. Include diagnostic tools such as stethoscope and ENT scope?
- Reimbursement influences the technology
- Network availability influences the technology
- "Synchronous" Interactive videoconferencing vs.
 "Asynchronous" store and forward
- Patient connects from a healthcare facility or patient connects from any location that is convenient (Direct-to-Consumer)
- Many programs are transitioning to activities that use the patient's smartphone – Platforms such as Zoom
- Remote vital signs monitoring, wearables...
- TTAC for support







EXAMPLE

OBGYN telehealth services at the University of Kentucky



High Risk OB outreach

- Reach patients that would not come to UK
- Diagnostic ultrasound + provider visit
- Modify clinic based on the resources in the community:
 - Ultrasound tech
 - Ultrasound machine
 - Videoconference system





GYN/ONC

- Very limited clinical resources in rural KY
- Patient work-up at local cancer center, if available
- Only one visit to UK for surgery
- Pre-op and post op visits via telehealth
- Community cancer center performs postsurgery chemotherapy and/or radiation treatments
- Patient is primarily managed by local providers



Low Risk OB

- Very limited clinical resources in rural KY
- Patient work-up at local cancer center, if available
- Only one visit to UK for surgery
- Pre-op and post op visits via telehealth
- Community cancer center performs postsurgery chemotherapy and/or radiation treatments
- Patient is primarily managed by local providers



\$4.9M PCORI Grant

- Expand and improve treatment for pregnant women with Opioid Use Disorder
- Pathways program, MAT, NAS reduction education, peer support, legal support, pre and post natal health services and health system navigation
- Compare in-person treatment to the same treatment via videoconference technology







Readiness Assessment

How to determine if you should use telehealth?

- Many of the previous barriers to entry are vanishing (technology complexity/cost, network availability/capacity, poor reimbursement rules)
- Ideally find a simple clinical problem that can be solved with a simple technical solution
- Consider a steering committee and a framework for evaluating new services
- Look at all the potential legal/regulatory hurdles
- Is there broad leadership support?
- Start with telehealth that mirrors the look-and-feel of a traditional clinic



Readiness Assessment P2

- Engage your legal and compliance team
- Carefully determine the problem you are trying to solve
- Select a technology that will address the problem. Make sure it is scalable. It should not be expensive. Many programs are using computers, tablets and smartphones for the equipment and cloud-based platforms such as Zoom and Blue Jeans Networks for connectivity.
- Confirm that you can bill for clinical services. Make sure your billing office understands how to submit a telehealth claim
- Continue to monitor your project to insure that it is clinically and financially successful.



Rob Sprang, MBA

Director, Kentucky TeleCare Co-Project Manager, Kentucky TeleHealth Network 859-218-5105 rsprang@uky.edu

Starting Telehealth in North Dakota

National
Family Planning
& Reproductive Health Association

Jean Smith, RN, BSN, PHN



March 2015

ND Board of Pharmacy created Administrative Guidelines for Practitioner Dispensing Law. Their opinion: dispensing could not be delegated to others ie: nurses.

March 2016

• Richland's Site Review: D/c Quick Start Standing Orders & Nurses could not dispense pills, patches or rings. Board of Nursing/Scope of Practice & Board of Pharmacy new law

April 2017

Attended gpTRAC Annual Conference and met a local Telemedicine expert (Marsha)

➤ June 2018 joined ND Health Information Technology Telehealth Domain Workgroup and learned key components of starting Telemedicine, billing, coding, policies ...

March 2019

March 21st - SB2155 Passed & signed Allowing ND FP RNs to dispense March 25th – First Telemedicine Encounter





Start-Up Costs







\$150



~2 hours + Practice



Financial Impacts

- Billing & Reimbursement
 - Add GT modifier
 - NDMA, BCBS, Sanford Expansion, BC Anthem, Sanford Health ~ all have reimbursed at same level as in person visits.

Contracting

- Added wording to contract "...and telemedicine encounters as scheduling allows.."
- Provider physically present: paid an hourly rate for 8 hours (6 hours clinic time, 2 hours travel time plus mileage)
- **Telemedicine encounters**: Providers paid per hour for each client encounter.

<u>Lessons Learned -</u> Practice!

- Scheduling
- Provider/Nurse connection
- Refer to the QFP checklist

Checklist Family planning and related



Family planning and related preventive health services

or women		Family planning services (provide services in accordance with the appropriate clinical recommendation)					
	Screening components	Contraceptive services ¹	Pregnancy testing and counseling	Basic infertility services	Preconception health services	STD services ²	Related preventive health service
History	Reproductive life plan	•	~	~	~	~	
	Medical history	~	✓	~	~	~	V
	Current pregnancy status	•					
	Sexual health assessment	•		~	~	~	
	Intimate partner violence				~		
	Alcohol & other drug use				~		
	Tobacco use	✓ (combined hormonal methods for clients ≥35 years)			•		
	Immunizations				•	↓ ⁴ (HPV & HBV)	
	Depression				~		
	Folic acid				~		
Physical examination	Height, weight & BMI	√ (hormonal methods)³		~	•		
	Blood pressure	✓ (combined hormonal methods)			√ 4		
	Clinical breast exam			~			✓ ⁴
	Pelvic exam	✓ (initiating diaphragm or IUD)	✓ (if clinically indicated)	•			
	Signs of androgen excess			~			
	Thyroid exam			~			
Laboratory testing	Pregnancy test	✓ (if clinically indicated)	•				
	Chlamydia	√ ⁵				√ 4	
	Gonorrhea	√ 5				√ 4	
	Syphilis					√ ⁴	
	HIV/AIDS					√ 4	
	Hepatitis C					√ 4	
	Diabetes				√ ⁴		
	Cervical cytology						V 4



Implementing Telehealth

Maine Family Planning

Maine Family Planning

- Subcontract with 20 FQHCs and 5 school-based health centers and 4 Planned Parenthood clinics
- > 45 sites serving over 22,000 Mainers per year
- Reproductive health care including:
 - Pregnancy testing and options counseling, pre-pregnancy counseling, adoption referrals
 - Contraception methods
 - STI testing and treatment, HIV testing and PrEP for prevention
 - Hormonal therapy for transgender patients through our Open Door program
 - Abortion care: in-clinic in Augusta and MAB at all sites and through the mail with participation in the TelAbortion study by Gynuity Health Projects
- Education department that trains educators how to teach comprehensive sexual health education to Maine's middle and high school students
- Primary Care in Ellsworth
- WIC and Maine Families in Washington County
- Advocacy work at the state and federal level



TEL: (207) 922-3222 👔 💟







BOOK AN APPOINTMENT

DONATE

BLOG

ABOUT US

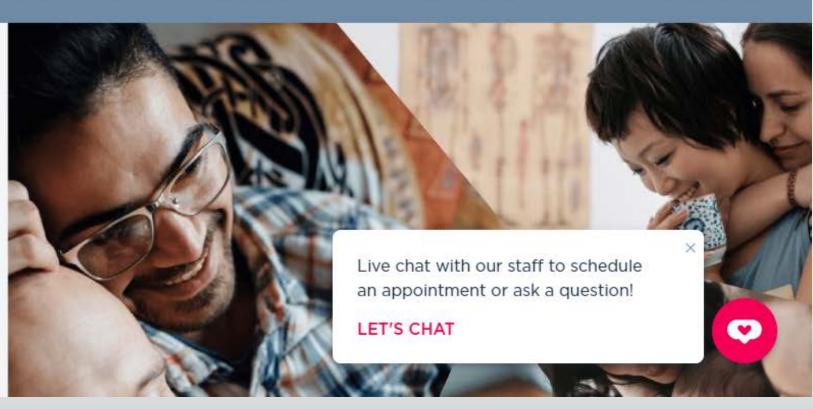
FOR PATIENTS

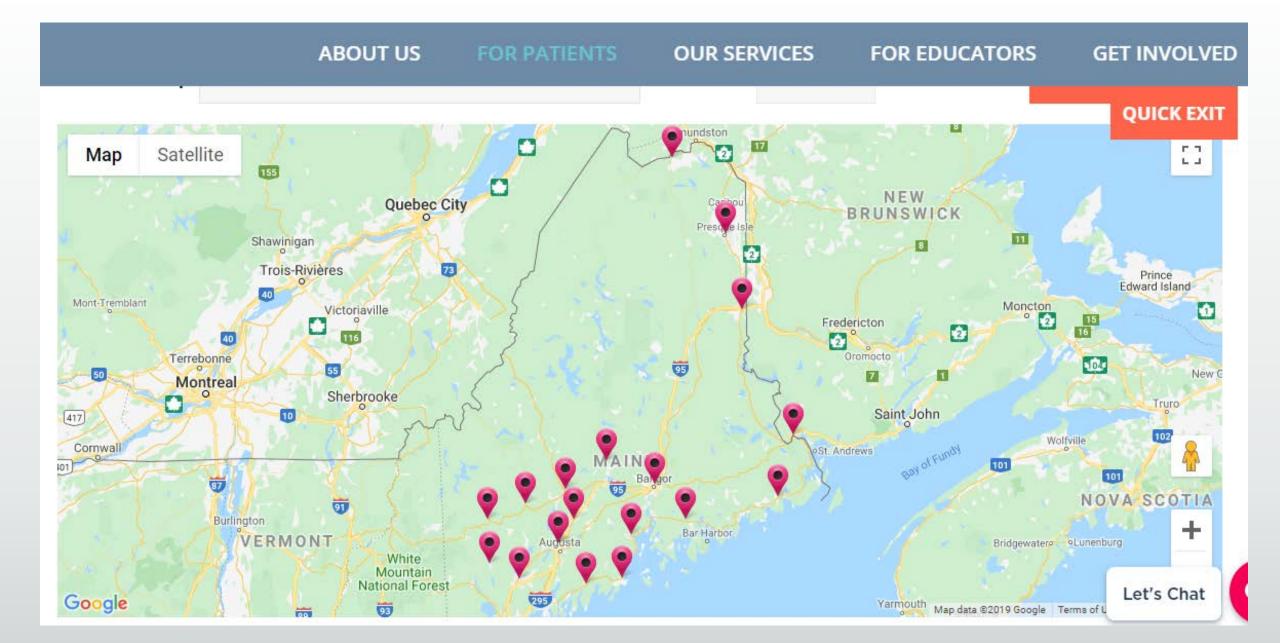
OUR SERVICES

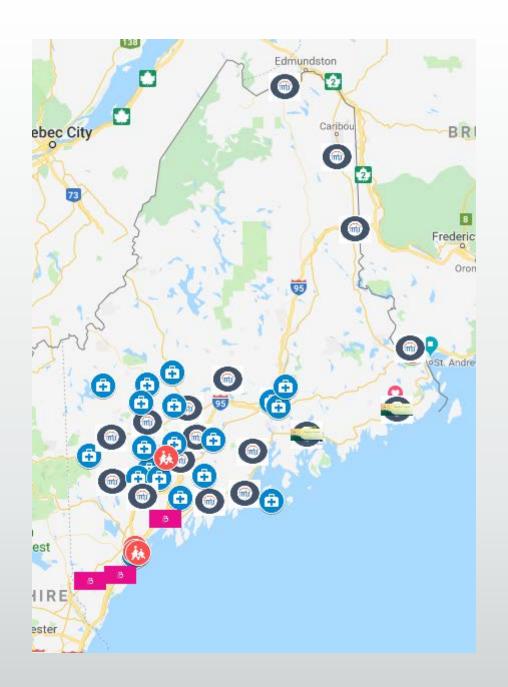
FOR EDUCATORS

GET INVOLVED









Telehealth Costs/Revenue

Range Per Provider \$50/month/provider/500 minutes \$200/month/provider/unlimited

Set-up Fee \$900-\$2500 (customization/staff training)

<u>Average Revenue</u> - \$76 per visit (Maine Family Planning Data)

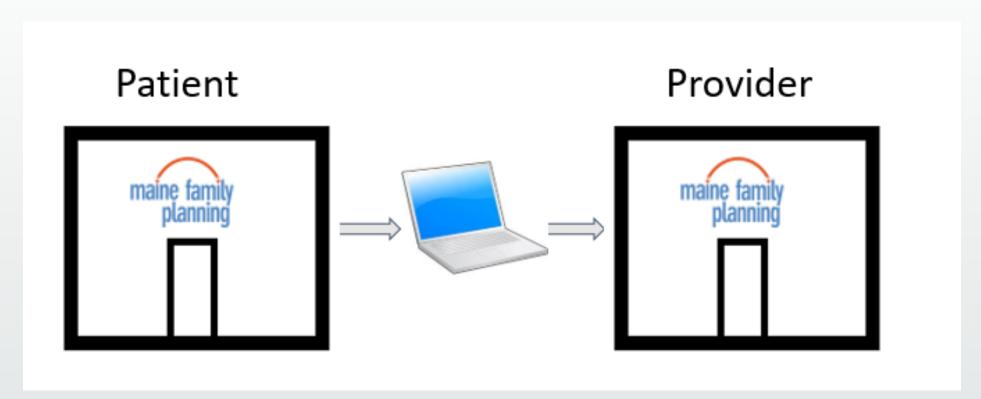
Scenario #1

Cost

- 2 providers/month/500 minutes = \$100/month for 1000 minutes
- 20 minutes per visit ÷ 1000 minutes = 50 visits = \$3,800
- One time Set-up Fee = \$900

Cost

- 1 provider/month/500 minutes = \$50/month for 500 minutes
- 20 minutes per visit ÷ 500 minutes = 25 visits = \$1,900

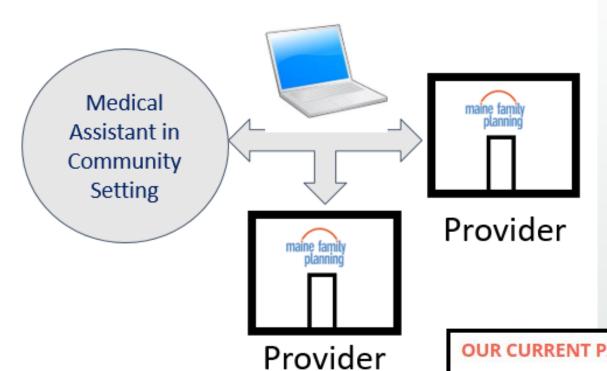


- Busy clinic, move patient to telehealth
- Provider shortage/call outs
- Provider training
- Open Door Services: Transgender health services

Scenario #2

Provider Illness:

- Rather than cancelling patients, convert patient visits to telehealth
- 16 patients cancelled = \$o revenue
- Convert 8 of those patient visits to telehealth =
- \$608-\$925 depending on payer mix



OUR CURRENT PARTNERS

INDIA STREET PUBLIC HEALTH CENTER

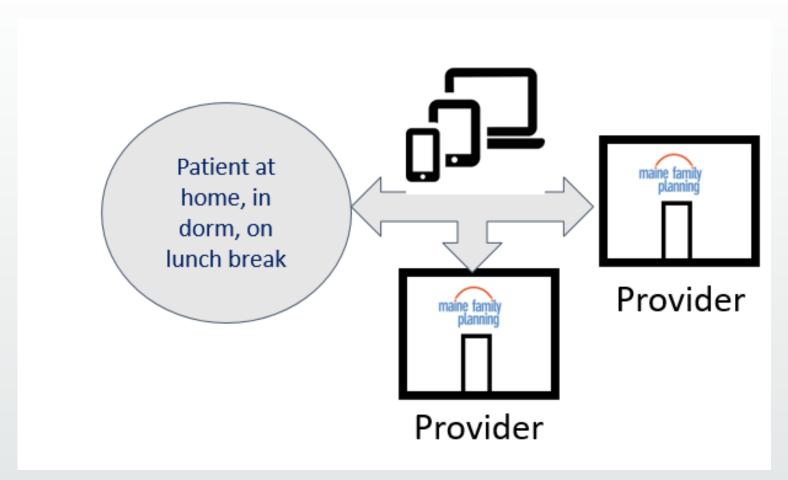












- Direct-to-Patient Services: contraception, UTI, options counseling
- TelAbortion Study
- Open Door Services: follow-up visits
- Infertility/Pre-pregnancy care
- > Consenting for MABs, streamlined MAB provision

Telehealth: Patient Side



TEL: (207) 922-3222 **(f) QUICK EXIT**





GET INVOLVED

BOOK AN APPOINTMENT

FOR EDUCATORS

DONATE

BLOG

ABOUT US

ABORTION SERVICES

HEALTHCARE

PRIMARY CARE

REPRODUCTIVE **EMPOWERMENT** PROJECT (REP)

REPRODUCTIVE

ONLINE VISITS







TEL: (207) 922-3222 👔





QUICK EXIT

BOOK AN APPOINTMENT

DONATE

ABOUT US

FOR PATIENTS

FOR EDUCATORS

GET INVOLVED

BLOG

ONLINE VISITS

Can't make it to a clinic? See a nurse practitioner right from your phone or computer from wherever you are! We offer direct-to-patient visits Monday to Friday from 10:00 AM-12:00 PM and from 1:30 PM-3:00 PM. We will make every effort to see you swiftly; however, depending on demand, there may be the possibility of scheduling for a later time if we are unable to accommodate an immediate request. Select the visit type below to find out more:

CONTRACEPTION					
PREGNANCY OPTIONS COUNSELING	+				
EMERGENCY CONTRACEPTION/PLAN B	+				
UNCOMPLICATED URINARY TRACT INFECTION (BLADDER INFECTION)	+				
CONTRACEPTION COUNSELING	+				

ONLINE VISITS

QUICK EXIT

Can't make it to a clinic? See a nurse practitioner right from your phone or computer from wherever you are! We offer direct-to-patient visits Monday to Friday from 10:00 AM-12:00 PM and from 1:30 PM-3:00 PM. We will make every effort to see you swiftly; however, depending on demand, there may be the possibility of scheduling for a later time if we are unable to accommodate an immediate request. Select the visit type below to find out more:

CONTRACEPTION

-

Are you interested in starting birth control pills, the ring, the patch?

What you will need:

- A computer with a camera or a smartphone (if you are using an iOS device, please download the app first)
- Your current height, weight, and blood pressure (you can take your blood pressure at many pharmacies or supermarkets, or report your blood pressure from a recent health care visit)
- Payment of \$30.00 via credit or debit card for the visit. The cost of pills/patches/rings is separate and whereast dependent on your insurance and the pharmacy you use.

Ready? If it is between the hours of 10:00 AM-12:00 PM or 1:30 PM-3:00 PM Monday to Friday, login here greet you shortly.





This waiting room is currently closed. Please return during the hours of operation:

Monday: 10:00 AM EST - 12:30 PM EST

Monday: 01:30 PM EST - 03:00 PM EST

Tuesday: 10:00 AM EST - 12:30 PM EST

Tuesday: 01:30 PM EST - 03:00 PM EST

Wednesday: 10:00 AM EST - 12:30 PM EST

Wednesday: 01:30 PM EST - 03:00 PM EST

Thursday: 10:00 AM EST - 12:30 PM EST

Thursday: 01:30 PM EST - 03:00 PM EST

Friday: 10:00 AM EST - 12:30 PM EST

Friday: 01:30 PM EST - 03:00 PM EST

.

WELCOME



LOGIN

Name or Description





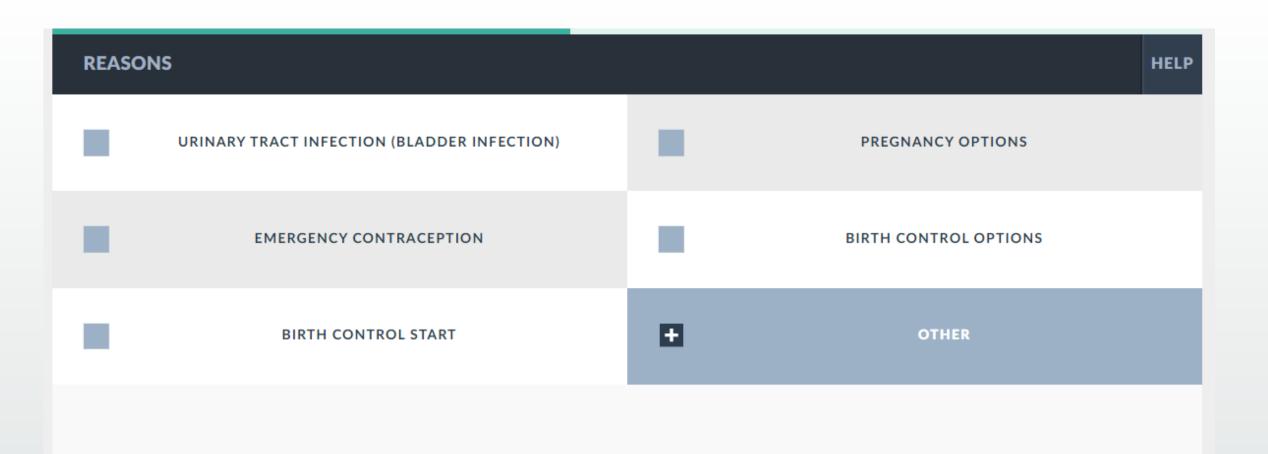
Date Of Birth

Month

Day

Year

DEMOGRAPHI	cs					HELP
01	02	03	04	05	06	07
08	09	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				
ADD BACK NOTE			> CONFIRM			





TELEHEALTH SERVICES INFORMED CONSENT

I understand that:

- · Video-conferencing technology will be used for my medical visit today, and that I will not be in the same room as my health care provider.
- Telehealth services may include: prescriptions, refills, education, diagnosis, and appointment scheduling.
- I will have access to my medical records in the same manner as if I had an in-person visit.
- My use of telehealth services is voluntary, and if I prefer to schedule an in-person visit I may do so without affecting my right to future care or treatment.
- Telehealth services with Maine Family Planning are only available during normal clinic/business hours.
- Telehealth services with Maine Family Planning are not intended to treat emergency medical conditions.
- If I need emergency medical care and/or medical care outside of normal clinic/business hours, it is my responsibility to seek care at an Urgent Care Center or Emergency Department.
- . I consent to telehealth services today and I am located in the state where my provider is licensed.

Confidentiality and Data Security

visit who is not necessary to my care.

- . Maine Family Planning does not videotape or record any part of the telehealth consultation.
- All federal and state laws and regulations that protect privacy and confidentiality of medical information also apply to telehealth services.
- Electronic systems used for telehealth video-conferencing will comply with all federal and state laws and regulations that protect individual healthcare and imaging data, confidentiality of patient identification, and include appropriate safeguards.

In Case of Technology Failure

I understand that:

- · During a telehealth visit we could encounter a technological failure.
- Maine Family Planning staff will inform me of the procedure to reconnect/resume services if technical difficulties arise and the videoconferencing connection is lost.
- If the session cannot be completed via online video-conferencing, Maine Family Planning staff will contact me by telephone to make an alternate plan for me to receive medical care.
- I understand that if I have Medicaid (MaineCare), I may have transportation costs covered for Medicaid (MaineCare) covered services.

*By signing this document, I hereby state that I have read, understood, and agree to the terms of this document.

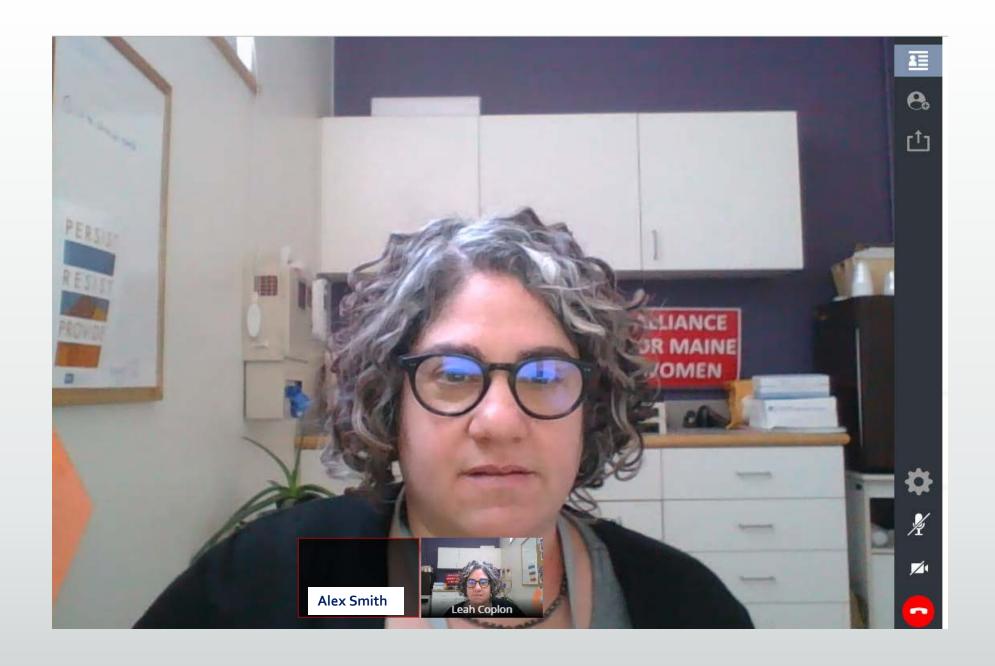


Waiting for your Medical Professional ...

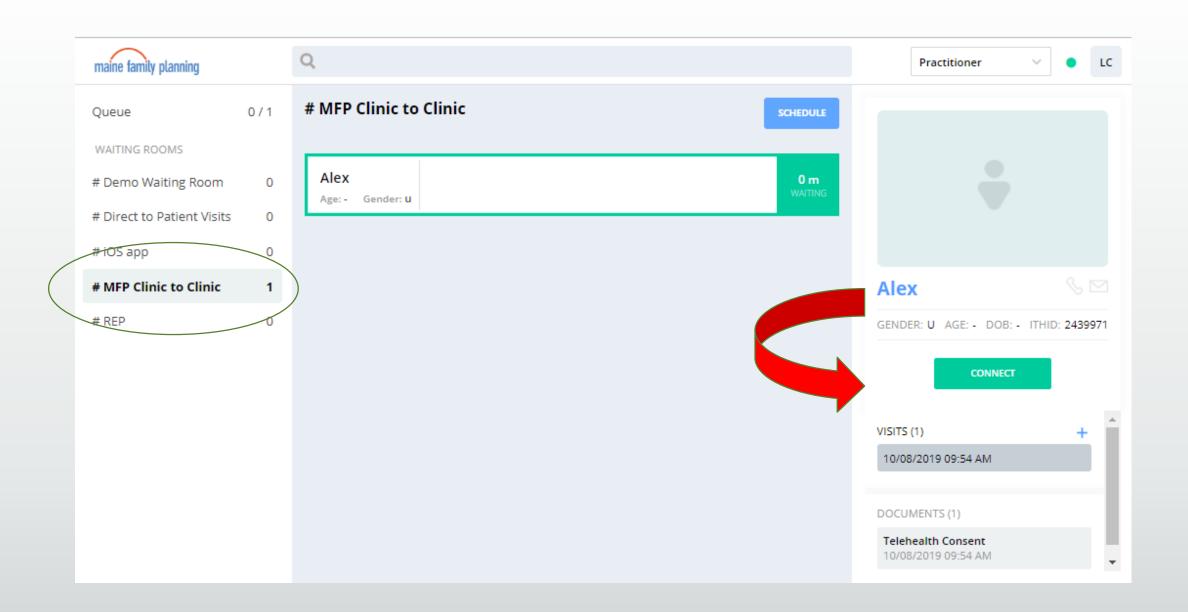
You are currently waiting for your Medical Professional.

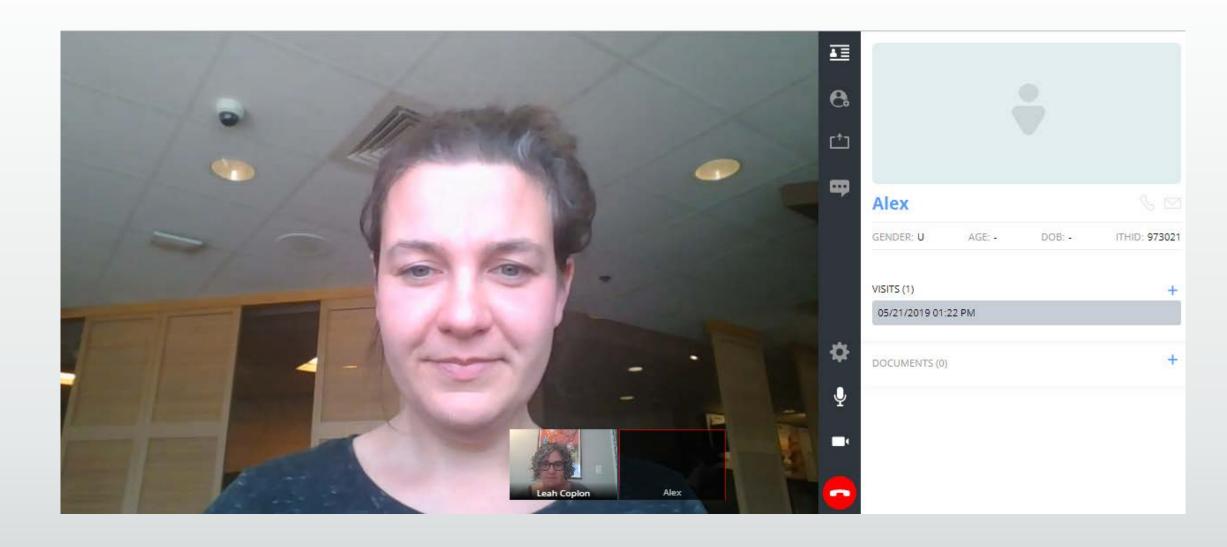
When you are eventually taken into a session you will likely be asked by your browser to allow access to your WebCam and Microphone. Please allow this as quickly as possible to begin your session, if you do not see this prompt or a video preview of yourself, you may need to check your browser settings or run the Diagnostics Tool.

RUN DIAGNOSTICS



Telehealth: Provider Side





Alex

U

10/08/2019

TELEHEALTH SERVICES INFORMED CONSENT

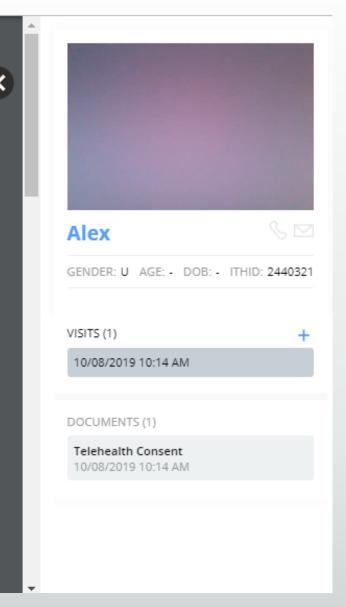
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- . I consent to telehealth services today and I am located in the state where my provider is licensed.

Confidentiality and Data Security

I understand that:

. I will be informed of all parties who are present at the provider side of the telehealth visit, and that I

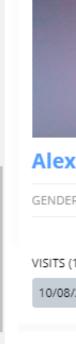


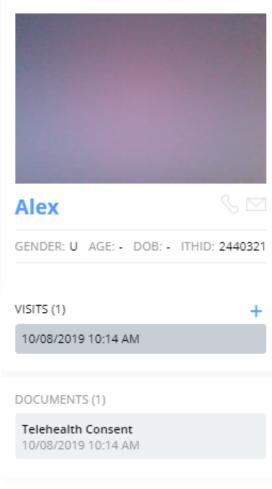
In Case of Technology Failure

I understand that:

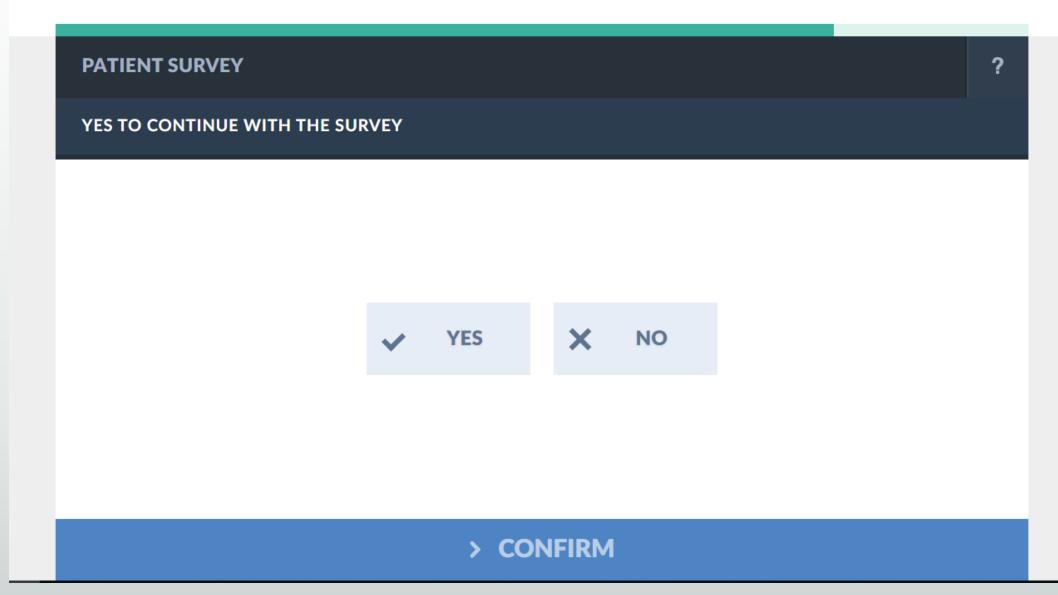
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10/08/2019 Alex *By signing this document, I hereby state that I have read, understood, and agree to the terms of this document.









"It would be about an hour and a half drive to get there, so when you think about the gas and the time to get to the location and then the amount of time you have to go there - especially in the middle of the week - it just makes things more difficult. So, really, having the ability to do it right here in town..."

"I really think that telehealth for rural areas is so so needed and could really help a lot of people. I have two kids and a job and a life so it was really helpful. And financially it saved on gas."

"...it would have been hard psychologically to wait another week to get in. Once you add on childcare, healthcare, the start of the school week...let's just say it would have changed my life drastically."

"I really don't think it would have felt any different had I not gone through telehealth, had it been in person with the doctor. It would have felt about the same...I felt everything was very secure and professional."

"I would almost say it was more private. I don't feel any concern with the technology world being exposing (or the potential). It was like the person was right in front of me in that moment, just the two of us interacting.

I'm pretty used to just talking to people through a screen so it felt quite normal. I'm a teenager - that's all we do is talk through screens!

"Thank you for going through and accommodating me to make that work in my life."







me Telehealth Resourc

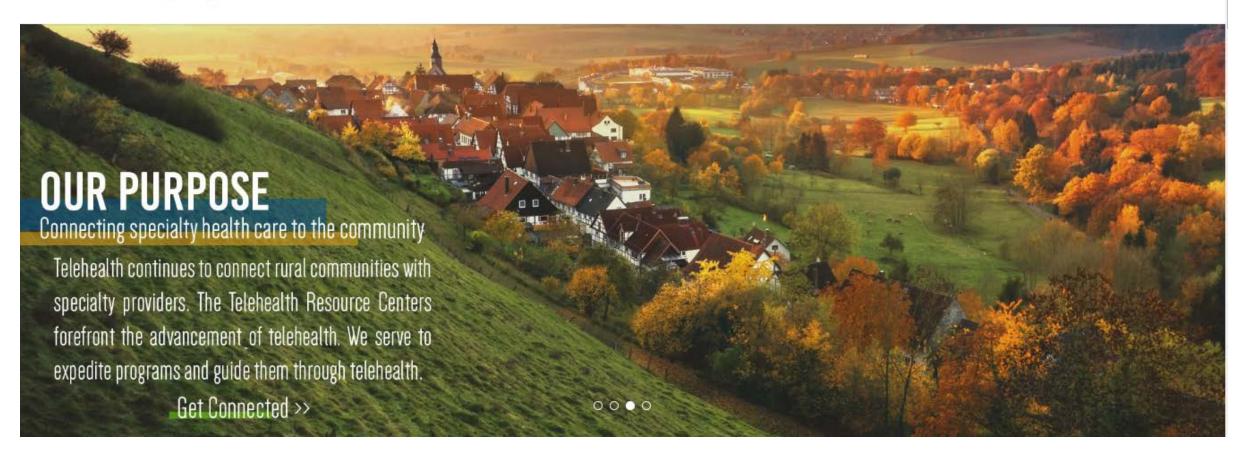
Find a TRC

Request Assistance











15 Key Steps for Creating a Business Proposal to Implement Telemedicine



1. EXECUTIVE SUMMARY

Concise overview (1-2 paragraphs max) of key elements:

- a. Usually written after all the other steps completed
- i. Why is telemedicine needed at this time & for this institution?
- ii. Who is initial target stakeholders (provider & patient groups)?
- iii. What is the main goal that will be achieved (outcomes)?
- iv. What will it cost & what will expected ROI be?

2. INTRODUCTION & BACKGROUND

a. Why does your institution need telemedicine now? Discuss gaps in patient care that can be addressed with telemedicine.

5. SERVICE PLAN ASSESSMENT

- a. Delivery mode(s) store-forward, real-time, remote monitoring, ECHO, hybrid
- b.Reimbursement who are your payors & do/will they reimburse for telemedicine? Will you choose a direct-to-consumer model where patient pays directly?
- c. Technology platform depending on your delivery model(s) what technology will be required? What are you willing to invest? Who will maintain? Will you invest in a commercial platform or build in-house? Consider both sides of the connection – provider & patient/other client.
- d.Champions not just providers, but patients, C-suite, IT, finance, administrative, legal etc.

6. MARKETING

National
Family Planning
& Reproductive Health Association

Telehealth Resource Centers (gpTRAC Toolkit)

National Consortium of Telehealth Resource Centers

Center for Connected Health Policy

National Telehealth Technology Assessment Resource Center

<u>American Telemedicine Association</u>

Office for Advancement of Telehealth

Medicare standard overview

State Medicaid Policy

Provider membership association resources

Local telehealth groups



Direct to Patient Services: Cheat Sheet

Hours: Monday-Friday 10:00 AM – 12:00 PM and 1:30 PM-3:00 PM

Patient:	
	Accesses InTouch through the link on the website and after signing Request for Medical Services
	Family Planning and the Telemedicine Consent enters the virtual waiting room.
Telehealth MA:	
	Sees a patient in the Direct to Patient waiting room and connects with the patient to review costs/contraindications to DTP to assure patient is an eligible candidate.
	If patient is not eligible, there will be no charge and Telehealth MA can help to schedule the patient in an MFP clinic if desired
	If patient is eligible register the patient in Athena and messages an NP/clinic where there is availability for a DTP
	Under First name used (in the Identification section) enter "DTP"
	Collect \$30.00
	Create an appointment in clinic schedule
	Place patient on hold in waiting room
SAC:	
	Print out Telehealth Billing Slip and give to NP
NP:	
	When patient is in schedule log into InTouch with Provider Side Link:



Vendors / Platforms Used

North Dakota: Pexip / Renovo

Maine: InTouch

Evaluating Vendor Options

- Telehealth Resource Centers
 - Conferences
 - Consult with your local TRC
- Research options that may be available through your state (depending on agency type)
- Talk to other similar providers get recommendations

Factors to Consider

- HIPAA Compliance
- Cost
- Features prioritize what you really need! (Avoid bells & whistles you do not)
 - Customization options (if needed)
- Frequency and volume of use
- Payment structure and options
- Current use AND future potential





SCOPE OF SERVICES

North Dakota Scope of Telehealth Services

What we do via telehealth

- New patients wanting to start depo, pill, ring
- Annual exams if no pap needed or patient does not want a physical exam

What we don't do via telehealth

- Anything symptomatic
- Services within scope of practice for RN to handle independently related to STDs or counseling

Maine Family Planning Visit Types:

- Clinic to clinic: MA/RN availability
 - Testing
 - Lab work
 - Visits that don't require physical exam
- Direct-to-Patient:
 - Counseling
 - Consenting
 - Follow-up/results
 - Prescription checks/refills



Staffing: North Dakota

IN-PERSON CLINIC

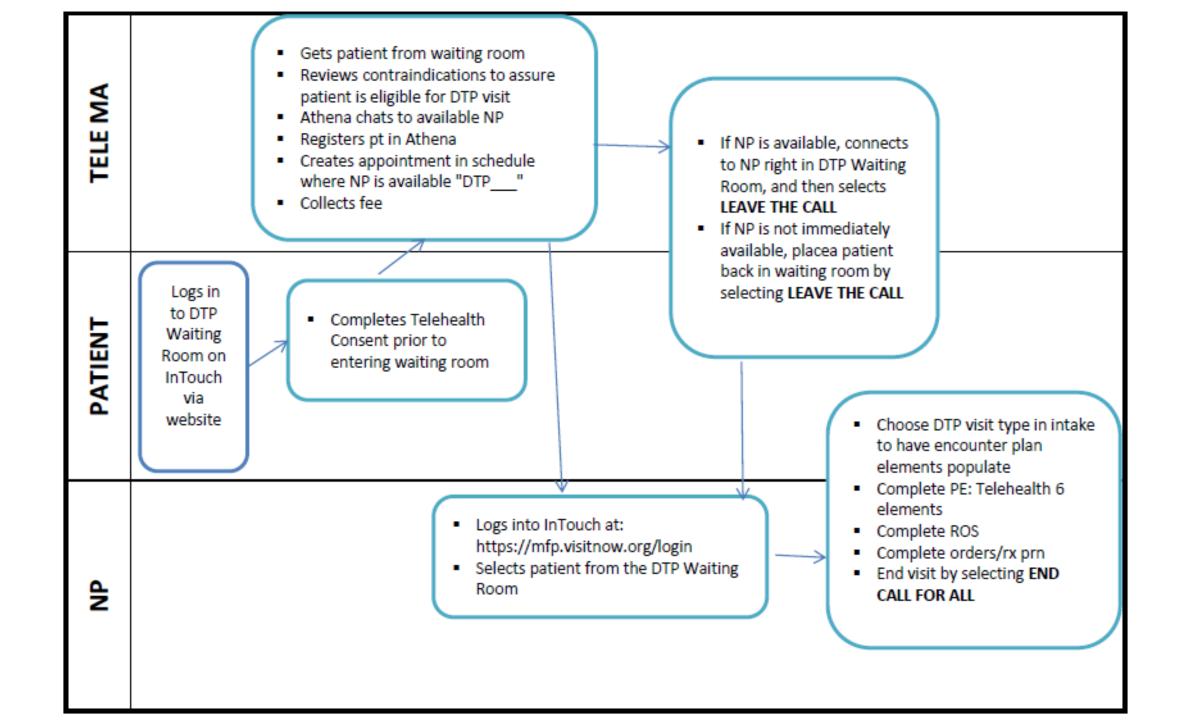
- RN
- Provider
- Financial intake staff person

TELEHEALTH CLINIC

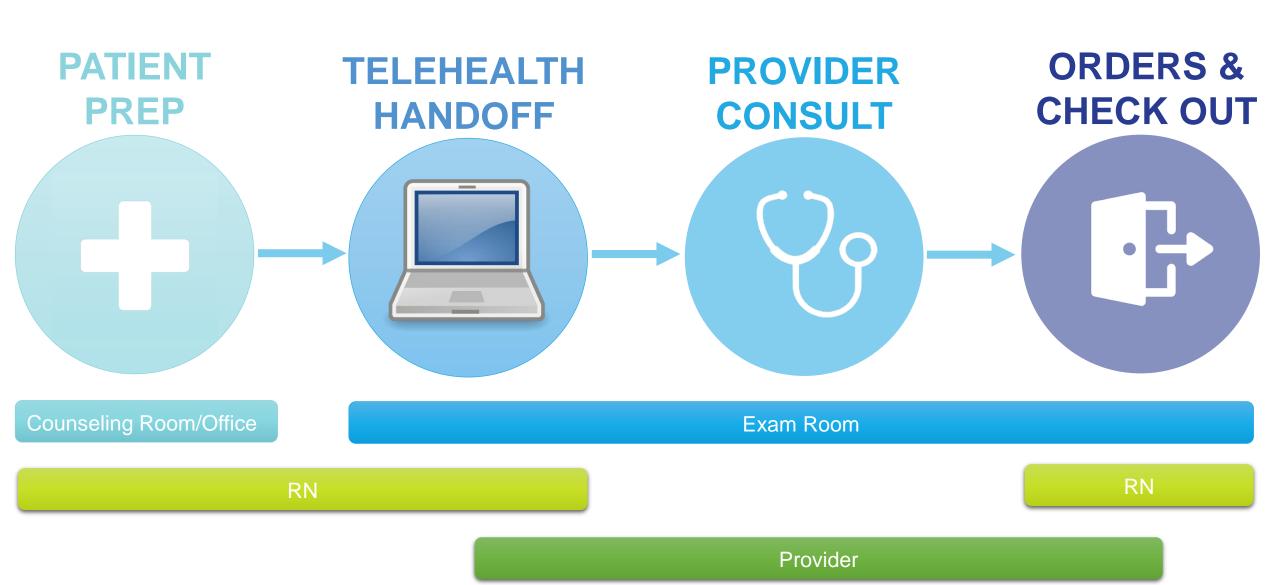
- RN (physically in clinic)
- Provider (remote)







North Dakota Telehealth Workflow





Billing & Coding

Medicare Telehealth Payment Eligibility Analyzer

Update charge slip or super bill with modifiers, as needed







WE KNOW YOU'RE BUSY.

LET US HELP MAKE LIFE A LITTLE EASIER WITH VIRTUAL VISITS.

Our new **VIRTUAL VISITS** allow you to see a Maine Family Planning nurse practitioner right from your phone or computer—**without ever leaving the house!**

SERVICES available through **VIRTUAL VISITS**:

- » birth control (prescriptions)
- » uncomplicated UTI treatment
- » emergency contraception
- » pregnancy options counseling
- » contraceptive counseling

...and more!



\$30 visit fee required at time of service.

MaineCare is accepted. Fee does not
cover additional services or prescriptions.



Marketing

- Campaign for patients
- Social marketing
- Call center/staff training to promote
- Community partners



Lessons Learned

- Adjust your workflow
- Build a business plan with sustainability in mind
 - Include marketing
 - Add or adjust staffing
- Training & Practice are key to staff comfort
 - Meet a range of learners' needs
 - Start delivering services right away when training is fresh

THANK YOU



cwise@nfprha.org



816-896-2950

