

- Policy:** It is the policy of [Organization name here] to ensure that all staff possess the knowledge and skills needed to provide safe and quality health care services to qualified beneficiaries in a HIPAA-compliant environment.
- Purpose:** To explain the knowledge and skills needed for the provision of telehealth services, from a Medicare Rules and Regulations perspective.
- Scope:** This document is applicable for rural health clinics and federally qualified health centers (RHC/FQHC), in accordance with the rules and regulations of the Centers for Medicare & Medicaid Services (CMS). Each organization should check their state regulations for further requirements and opportunities.

*Temporary PHE Guidance\**

*“The healthcare system workforce will be expanded “by removing barriers for physicians, nurses, and other clinicians to be readily hired from the community or from other states.”*

*“Telehealth services can be furnished by any health care practitioner working for the RHC or the FQHC within their scope of practice.”*

For further reading: <https://www.cms.gov/files/document/covid-rural-health-clinics.pdf>

For further reading: <https://www.cms.gov/files/document/omh-rural-crosswalk.pdf>

\*Temporary guidance related to Public Health Emergency (PHE)

**Procedures:**

**I. Knowledge and Skills of Telehealth Services and Practice.**

- A. Physicians and Practitioners must have the knowledge and skills to provide telehealth services.
  1. Physician and Practitioner knowledge of providing telehealth services must include:
    - a) Knowledge of federal and state telehealth rules and regulations of HIPAA and telehealth, as well as telehealth-specific documentation. **(Refer to RHC/FQHC Distant Site, Originating Site, Documentation and Technology policies)**

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- b) Knowledge of patient telehealth education, to include explaining to the patient the purpose of usage of technology during the visit. **(Refer to RHC/FQHC Consent, Distant Site, Originating Site, and Technology policies)**
  - c) Knowledge of data collection and evaluation of telehealth performance improvement initiatives.
  - d) Knowledge of how to access IT support.
2. Physician and Practitioner skills for providing telehealth services must include:
- a) The ability to access and operate technology, to include video equipment and examination camera, computer/tablet/ Smartphone, microphone, and other peripherals as indicated/needed (i.e., electronic stethoscope, otoscope, etc.).
  - b) The ability to direct the use and accept data/video inputs from originating site equipment.

*Temporary PHE Guidance\**

*"42 C.F.R. 491.8(b)(1). CMS is modifying the requirement that physicians must provide medical direction for the clinic's or center's health care activities and consultation for, and medical supervision of, the health care staff, only with respect to medical supervision of nurse practitioners, and only to the extent permitted by state law. The physician, either in person or through telehealth and other remote communications, continues to be responsible for providing medical direction for the clinic or center's health care activities and consultation for the health care staff, and medical supervision of the remaining health care staff."*

*For further reading: <https://www.cms.gov/files/document/omh-rural-crosswalk.pdf>*

- B. Nursing Personnel must have the knowledge and skills to provide telehealth services.
1. Nursing Personnel knowledge of providing telehealth services must include:
- a) Knowledge of federal and state telehealth rules and regulations, HIPAA and telehealth, as well as telehealth-specific documentation. **(Refer to RHC/FQHC Distant Site, Originating Site, Technology, and Documentation policies)**
  - b) Knowledge of setting-up the space for a telehealth visit, and how to check-in/check-out the patient. **(Link to RHC/FQHC Distant and Originating Site policies)**
  - c) Knowledge of patient telehealth education, to include explaining to patient the purposed and usage of technology during the visit.

## Knowledge and Skills for Telehealth Services

- d) **(Link to RHC/FQHC Consent, Distant Site, Originating Site, and Technology policies)**
- e) Knowledge of data collection and evaluation of telehealth performance improvement initiatives.
- f) Knowledge of how to access IT support.
- 2. Nursing Personnel skills for providing telehealth services must include:
  - a) The ability to access and operate technology, to include setting up video equipment and examination camera, microphone, and other peripherals as indicated/needed (i.e., electronic stethoscope, etc.).  
[https://www.gptrac.org/file\\_download/inline/a1531fee-c873-434b-975a-f544d21ac72a](https://www.gptrac.org/file_download/inline/a1531fee-c873-434b-975a-f544d21ac72a)

### *Temporary PHE Guidance\**

*“Any RHC/FQHC visiting nurse service solely to obtain a nasal or throat culture would not be considered a nursing service because it would not require the skills of a nurse to obtain the culture as the specimen could be obtained by an appropriately-trained medical assistant or laboratory technician.”*

*For further reading: <https://www.cms.gov/files/document/covid-rural-health-clinics.pdf>*

*“RHCs and FQHCs can provide visiting nursing services to a beneficiary’s home with fewer requirements, making it easier for homebound beneficiaries to receive care.”*

*For further reading: <https://www.cms.gov/files/document/omh-rural-crosswalk.pdf>*

- C. Administrative Personnel must have the knowledge and skills to support telehealth services.
  - 1. Administrative personnel knowledge of telehealth services must include:
    - a) Knowledge of HIPAA and telehealth services. **(Refer to RHC/FQHC Technology policy)**
    - b) Knowledge of phone etiquette and scheduling appointments.
    - c) Knowledge of data collection for performance improvement.
    - d) Knowledge of how to access IT support.
  - 2. Administrative personnel skills for the support of telehealth services must include:
    - a) The ability to use a computer, software, and the phone.

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***Tips:***

- *Ensure the organization's clinical educator is familiar with telehealth-specific knowledge and skills.*
- *Telehealth-specific knowledge and skills should be integrated into the staff member's orientation and competency checklist and renewed annually.*