

Critical Access Hospital

Knowledge and Skills for Telehealth Services

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 critical access hospitals (CAH), 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*

“CMS is waiving the requirement for CAHs that a doctor of medicine or osteopathy be physically present to provide medical direction, consultation, and supervision for the services provided in the CAH at § 485.631(b)(2). CMS is retaining the regulatory language in the second part of the requirement at § 485.631(b)(2) that a physician be available “through direct radio or telephone communication, or electronic communication for consultation, assistance with medical emergencies, or patient referral.” Retaining this longstanding CMS policy and related longstanding subregulatory guidance that further described communication between CAHs and physicians will assure an appropriate level of physician direction and supervision for the services provided by the CAH. This will allow the physician to perform responsibilities remotely, as appropriate. This also allows CAHs to use nurse practitioners and physician assistants to the fullest extent possible, while ensuring necessary consultation and support as needed.”

“To the extent NCDs and LCDs require a specific practitioner type or physician specialty to furnish or supervise a service, during this PHE, the Chief Medical Officer or equivalent of a hospital or facility will have the authority to make those staffing decisions.”

“CMS is waiving the minimum personnel qualifications for clinical nurse specialist, nurse practitioners, and physician assistants described at 42 CFR 485.604 (a)(2), 42 CFR 485.604 (b)(1-3), and 42 C.F.R 485.604 (c)(1-3). Clinical Nurse Specialists, Nurse Practitioners, and Physician Assistants will still have to meet state requirements for licensure and scope of practice, but not additional Federal requirements that may exceed State requirements. These flexibilities should be implemented so long as they are not inconsistent with a State or pandemic/emergency plan.”

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

*Temporary guidance related to Public Health Emergency (PHE)

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Procedures:

I. Knowledge and Skills of Telehealth Services and Practice.

A. Physicians and Practitioners must have the knowledge and skills to provide telehealth services and/or consult with distant site providers.

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 CAH Site Requirements, Documentation, and Technology policies)**
- b) Knowledge of patient telehealth education, to include explaining to the patient the purpose of usage of technology during the consultation. **(Refer to CAH Consent, Site Requirements, and Technology policies)**
- c) Knowledge of data collection and evaluation of telehealth performance improvement initiatives.
- d) Knowledge of how to access IT support.
- e) Knowledge of the most appropriate platform and workflow based on the type of consultation to be performed (phone, video visit or e-consult). **(Refer to CAH Site Requirements policy)**

2. Physician and Practitioner skills for providing telehealth services must include:

- a) The ability to access and operate technology, to include video equipment, examination camera/s, 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 incoming data and images from originating site equipment.

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 CAH Site Requirements, Technology, and Documentation policies)**
- b) Knowledge of setting-up the space for a telehealth consultation. **(Refer to CAH Site Requirements policy)**
- c) Knowledge of patient telehealth education, to include explaining to patient the purpose and usage of technology during the

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consultation. (Refer to CAH Consent, Site Requirements, and Technology policies)

- d) Knowledge of data collection and evaluation of telehealth performance improvement initiatives.
- e) 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, otoscope, etc.).

https://www.gptrac.org/file_download/inline/a1531fee-c873-434b-975a-f544d21ac72a

C. Administrative Personnel, such as health unit clerks, must have the knowledge and skills to support the use of telehealth services.

- 1. Administrative personnel knowledge of telehealth services must include:
 - a) Knowledge of HIPAA and telehealth services. (Refer to CAH Technology policy)
 - b) Knowledge of phone etiquette and scheduling appointments with the distant consultant.
 - c) Knowledge of confirming the appropriate portal link to be used to connect with the distant consultant.
 - 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.

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 verified annually.*

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