

TELEMEDICINE COMPARISONS

	CMS - Medicare Telehealth	New York State Dept. of Health (Medicaid FFS)	New York State Office of Mental Health - Telemental Health	New York State Office of Addiction Services and Supports - Telepractice
Definition	<p>Interactive telecommunications system means multimedia communications equipment that includes, at a minimum, audio and video equipment permitting two-way, real-time interactive communication between the patient and distant site physician or practitioner. Telephones, facsimile machines, and electronic mail systems do not meet the definition of an interactive telecommunications system.</p> <p>Transmitting medical information to a physician or practitioner who reviews it later is permitted only in Alaska or Hawaii Federal telemedicine demonstration programs.</p> <p>CMS also has a number of codes that are not called "telehealth services" that providers can be reimbursed for. Examples include chronic care management and remote physiologic monitoring, virtual check-ins, remote evaluation of pre-recorded patient information, interprofessional internet consultations, and e-visits. Rules may differ for Federally Qualified Health Centers (FQHCs) and Rural Health Clinics (RHCs).</p>	<p>Telehealth is defined as the use of electronic information and communication technologies to deliver health care to patients at a distance.</p>	<p>"Telemental Health," for the purpose of these regulations, is defined as the use of two-way real time-interactive audio and video equipment to provide and support mental health services at a distance. Such services do not include a telephone conversation, electronic mail message or facsimile transmission between a provider and a recipient, or a consultation between two professionals or clinical staff.</p>	<p>"Telepractice" means the use of two-way real-time interactive telecommunication system for the purpose of providing certain addiction services at a distance.</p>
Originating Sites-location of the patient ("spoke" site)	<ol style="list-style-type: none"> Physician and practitioner offices Hospitals Critical Access Hospitals (CAHs) Rural Health Clinics Federally Qualified Health Centers Hospital-based or CAH-based Renal Dialysis Centers (including satellites) Skilled Nursing Facilities (SNFs) Community Mental Health Centers (CMHCs) Renal Dialysis Facilities Home of beneficiaries with End-Stage Renal Disease (ESRD) getting home dialysis Mobile Stroke Units Home of patient receiving treatment for SUD/ODU and co-occurring mental health disorders <p>Note: Medicare does not apply originating site geographic conditions to hospital-based and CAH-based renal dialysis centers, renal dialysis facilities, and beneficiary homes when practitioners furnish monthly home dialysis ESRD-related medical evaluations. * Independent Renal Dialysis Facilities are not eligible originating sites.</p>	<ol style="list-style-type: none"> Facilities licensed under Article 28 of the PHL (general hospitals, nursing homes, and diagnostic and treatment centers); Facilities licensed under Article 40 of the PHL (hospice programs); Facilities as defined in Subdivision 6 of Section 1.03 of the Mental Hygiene Law (MHL) (includes clinics certified under Articles 16, 31 and 32); Certified and non-certified day and residential programs funded or operated by OPWDD; Private physician's or dentist's offices located within the state of New York; Any type of adult care facility licensed under Title 2 of Article 7 of the SSL; Public, private and charter elementary and secondary schools located within the state of New York; School-age child care programs located within the state of New York; Child daycare centers located within the state of New York; and The member's place of residence located within the state of New York or other temporary location within or outside the state of New York. 	<p>Originating or "spoke" site means a site where the recipient is physically located at the time mental health services are delivered to her/him by means of Telemental Health Services, within the State of New York, or another temporary location within or outside the State of New York.</p>	<p>"Originating site" or "spoke site" means the site at which the patient is located at the time the service is being provided via the interactive telecommunications system, which may include the patient's place of residence.</p>
Distant Sites-location of the practitioner ("hub" site)	<p>Not defined or specified - no reimbursement for providers based internationally. FQHCs and RHCs cannot function as distant site providers.</p>	<p>Any secure location where the telehealth provider is located within the fifty United States or United States territories.</p>	<p>Anywhere the provider is located. Prescribers may be located anywhere within the US; other practitioner types may be located anywhere with NYS.</p>	<p>"Distant site" or "hub site" means the site at which the practitioner delivering the service is located at the time the service is provided via the interactive telecommunications system.</p>
Practitioners at the distant site	<ol style="list-style-type: none"> Physicians; ☐ Nurse practitioners (NPs); ☐ Physician assistants (PAs); Nurse-midwives; Clinical nurse specialists (CNSs); Certified registered nurse anesthetists; Clinical psychologists (CPS); Clinical social workers (CSWs); and Registered dietitians or nutrition professionals 	<ol style="list-style-type: none"> Physicians; PAs; Dentists; Nurse practitioners; Registered professional nurses (only when such nurse is receiving patient- specific health information or medical data at a distant site by means of RPM); Podiatrists; Optometrists; Psychologists; Social workers; Speech language pathologists; Audiologists; Midwives; Physical therapists; occupational therapists; Certified diabetes OR asthma educators; Genetic counselors; Credentialed alcoholism and substance abuse counselors (CASAC) credentialed by OASAS Providers authorized to provide services and service coordination under the Early Intervention (EI) Program pursuant to Article 25 of PHL Hospitals licensed under Article 28 of PHL, including residential health care facilities serving special needs populations; Home care services agencies licensed under Article 36 of PHL; Hospices licensed under Article 40 of PHL 	<p>Qualified mental health professionals including licensed psychiatrists, LPNs, creative arts therapists, licensed psychoanalysts, licensed psychologists, marriage and family therapists, mental health counselors, NPs, PAs, registered professional nurses, and social workers (LMSW or LCSW).</p>	<p>"Practitioner" means:</p> <ol style="list-style-type: none"> A prescribing professional eligible to prescribe buprenorphine pursuant to federal regulations; Other clinical staff credentialed or approved by the Office, <i>except peer advocates and student interns</i>, who are providing addiction services consistent with their scope of practice and as authorized pursuant to this Part.
Coverage for Services	<p>Medicare beneficiaries are eligible for telehealth services only if the patient is located at an originating site that is in:</p> <ol style="list-style-type: none"> A rural Health Professional Shortage Area (HPSA) located either outside of a Metropolitan Statistical Area (MSA) or in a rural census tract; or A county outside of a MSA. 	<p>Medicaid covered services provided via telehealth include assessment, diagnosis, consultation, treatment, education, care management and/or self-management of a Medicaid member. Telephone conversations, e-mail or text messages, and facsimile transmissions between a practitioner and a Medicaid member or between two practitioners are not considered telehealth services and are not covered by Medicaid when provided as stand-alone services.</p> <p>Remote consultations between practitioners, without a Medicaid member present, including for the purposes of teaching or skill building, are not considered telehealth and are not reimbursable. The acquisition, installation and maintenance of telecommunication devices or systems is not reimbursable.</p> <p>Store and Forward: Pre-recorded videos and/or static digital images (e.g., pictures), excluding radiology, must be specific to the member's condition as well as be adequate for rendering or confirming a diagnosis or a plan of treatment.</p>	<p>Under the Medicaid program, Telemental Health Services are covered when medically necessary and under the following circumstances:</p> <ol style="list-style-type: none"> The request for Telemental Health Services and the rationale for the request are documented in the individual's clinical record; The clinical record includes documentation that the encounter occurred; If the person receiving services is not present during the provision of the Telemental Health Service, the service is not eligible for Medicaid reimbursement. <p>To constitute a reimbursable service, the person receiving services is located at the spoke site and the Telemental Health Practitioner is located at the hub site.</p>	<p>Delivery of services via telepractice are covered when medically necessary and under the following circumstances:</p> <ol style="list-style-type: none"> The patient is located at an originating/spoke site and the practitioner is located at a distant/hub site; or The patient is located at another designated program, an additional location of a designated program or at an in-community location approved by the Office; and the practitioner is located in another designated program; The patient is present during the telepractice session; The request for a telepractice session and the rationale for the request are documented in the patient's case record; The case record includes documentation that the telepractice session occurred and the results and findings were communicated to the designated provider. If the person receiving services is not present during the telepractice service, the service is not eligible for third party reimbursement and any incurred costs may remain the responsibility of the designated provider. Telepractice services may only be delivered via technological means approved by the CMS, provided such means are compliant with federal confidentiality requirements. If all or part of a telepractice service is undeliverable due to a failure of transmission or other technical difficulty, reimbursement shall not be provided.
Eligible Services	<p>Medicare specifies a list of HCPCS and CPT codes for eligible telehealth services, which is updated each year.</p> <p>https://www.cms.gov/Medicare/Medicare-general-information/telehealth/telehealth-codes</p>	<p>Telemedicine (two-way electronic audio-visual communications), Store and Forward (asynchronous electronic transmission of a member's health information), and Remote Patient Monitoring (digital technologies to collect medical data and other PHI)</p>	<p>Initial Assessment, Psychiatric Assessment, Psychiatric Consultation, Crisis Intervention, Psychotropic Medication Treatment, Psychotherapy (Individual, Family, Group, and Family Group), Developmental Testing, Psychological Testing and Complex Care Management.</p>	<p>Admissions assessments, direct transfers, psycho-social evaluations and mental health consultations, medication assisted treatment prescribing and monitoring, counseling (individual and group), and other services as approved by the Office.</p>