Guidelines for Telehealth and Meaningful Use

For the purposes of the EHR Incentive Program, the CMS definition of an office visit includes telehealth. In the Stage 3 Final Rule, CMS specified that "an office visit is defined as any billable visit that includes the following: concurrent or transfer of care visits, consultant visits, or prolonged physician service without direct, face-to-face patient contact (for example, telehealth)."

Meaningful Use (MU) Objectives

Actions performed during telehealth visits count toward meeting your MU objectives, as long as you actually perform the actions related to the MU objective and document your activities in your certified EHR technology (CEHRT). When calculating your performance on MU objectives, the denominator must include all billable services (whether in-person or telehealth). To ensure that your numerator includes actions performed via telehealth, be sure to document the actions in your CEHRT the same way you would when conducting an in-person visit.

To ensure that your billable telehealth encounters are properly tracked, you may need to enable additional functionality within your EHR or obtain a third-party telehealth module. With some EHRs, you must use an office visit progress note to document actions related to MU objectives. Also, your CEHRT's telehealth module may be linked to your patient portal, allowing actions taken within the patient portal to be automatically documented within the EHR.

We recommend talking to your EHR vendor to determine what additional steps, if any, may be required to ensure that actions performed during your telehealth visits are being counted toward your MU objectives.

If your practice conducts billable telehealth encounters, you get credit for the activities corresponding to the following Meaningful Use objectives and measures:

- Patient Portal Access: when patients log into the patient portal to initiate a telehealth visit;
- Patient Education: when providers send patient education through the portal during or after the patient's telehealth visit;
- Secure Messaging: when the practice sends or responds to secure messages through the patient portal
- View, Download, Transmit: when a patient logs into the portal to check their lab results, diagnosis and medical records; and
- Patient Generated Health Data: when a patient fills out questionnaires through the patient portal before their visit or connects their health devices to the patient portal.

Whether your practice uses your CEHRT's built-in telehealth module or a third-party telehealth module, make sure the activities listed above are documented within your CEHRT, and verify that your CEHRT accounts for the activities in your MU dashboard.

Patient Volume Threshold

You must also include billable telehealth encounters when calculating your Medicaid Patient Volume Threshold (PVT). Telehealth encounters need to be included regardless of which method you use to calculate your PVT (paid claims or enrollee). For more information, see CMS **FAQ 7535** (on page 6) here.