

## **Key Telehealth Issues (Kansas, November 2020)**

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### Policy

- Reimbursement of telebehavioral health codes (including psychiatry, therapy, substance abuse treatment, and crisis screening).
  - Adopt a broad definition of “originating site” consistent with the Kansas Telemedicine Act (“a site at which a patient is located at the time healthcare services are provided by means of telemedicine”).
    - This would be inclusive of sites such as place of employment, home, school, etc. that can meet client/patient privacy and safety standards.
    - Organizations and providers would need guidance on setting policy and training standards to define limits of the originating site (e.g., client/patient should not be in a moving vehicle, public setting, connecting when traveling/crossing state lines, etc.)
  - Consider both televideo and telephone services for geographic areas that demonstrate broadband deficiencies until such time those deficiencies can be resolved.
  - Identify mechanisms to prevent loss of facility fees/revenue when telebehavioral services are provided. Telebehavioral services to non-supervised sites increase the burden and cost of IT/technical support (e.g., “virtual rooming fees,” support for the originating site, etc.)

### Organizations

- Organizations that provide telebehavioral health services should develop and adopt internal telehealth policies that speak to pertinent administrative, clinical, and technology issues to demonstrate knowledge of, planning for, and adherence to appropriate telehealth standards.
  - If professional staff provide telebehavioral health services from remote/home offices rather, organizations should define policy and training requirements for working remotely.
  - Behavioral health organizations/agencies should be cognizant of the increased cognitive, physical, and emotional demand created by increased productivity and use of technology on the workforce and be responsive to maintain the health and well-being of the workforce.

### Providers

- Telebehavioral health providers should complete basic telehealth training with a focus on the clinical delivery of services and inclusive of risk and crisis management.
- Telebehavioral health providers should be competent in assessing and determining the appropriateness of telehealth service provision.
- Telebehavioral health providers should be educated about the basic parameters of telehealth billing, record keeping, and criteria for reimbursement (including HIPAA and connectivity standards).
- Telebehavioral health providers should have access to training and support to mitigate the increased cognitive, physical, and emotional demands associated with a significant increase in productivity and use of technology to provide care.

### Consumers

- Consumers should be provided with education and support to effectively engage in telehealth.
- Consumers should be informed of their rights and options for behavioral health care delivery.
- Consumers should be provided with informed consent for engagement in telebehavioral health services, including standardly accepted risks and benefits.