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Telehealth Policy Analysis: Recommendations to Improve Medicaid Reimbursement in
Michigan

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Abstract

Purpose: At the onset of the COVID-19 pandemic, the Centers for Medicare & Medicaid Services (CMS) granted flexibility for audio-only visits. However, CMS indicated possible cessation of reimbursement for audio-only telehealth when the pandemic ends. This project explored current audio-only telehealth reimbursement and proposed post-pandemic policies for Medicaid beneficiaries at the state level and the perceived benefits and challenges from the perspective of rural providers.

Methods: Data was collected from a rural ambulatory clinic that included patients ≥ 18 who received telehealth during the study period (April 2020 - May 2021). The providers at this clinic were surveyed on the experience and usability of audio-only telehealth. These results were reported using chi-square statistics and p values. Finally, ten purposively selected states were analyzed for their telehealth policies and legislation throughout the pandemic.

Findings: There were 5,024 telehealth visits conducted during the data collection with 47% being audio-only. Survey results were not statistically significant, however, themes regarding audio-only telehealth barriers emerged indicating a lack of reimbursement, inability to perform a physical exam, and technology limitations. The state policy analysis showed that nine out of ten states had proposed bills to continue reimbursing for audio-only telehealth. Most states planned to reimburse for all care, provided it can be performed the same as in-person care.

Conclusions: The results of this project gave insight into the usefulness of audio-only telehealth after the pandemic. This study identifies strategies that can be used to inform policy-makers regarding the continuation of audio-only telehealth reimbursement.

Key Words: telehealth, audio only, Medicaid, policy, rural health

Telehealth Policy Analysis: Recommendations to Improve Medicaid Reimbursement in Michigan

Telehealth was originally developed to increase access to care for individuals living in rural and underserved regions. Since the start of the COVID-19 pandemic, higher utilization of telehealth across various types of practices has now become the mainstay.¹ According to the Centers for Disease Control and Prevention (CDC), there was a 154% increase in telehealth visits during the last week of March 2020, compared with the same period in 2019.⁴ Currently, there is an increased amount of reimbursement for telehealth services in Michigan including audio-only services, but there is no plan to make these policies permanent.²

Telehealth is defined by the Health Resources and Services Administration as the use of electronic information and telecommunications technologies to support and promote long-distance healthcare, health-related education, public health, and health administration.³ Supportive technologies for healthcare include, but are not limited to, virtual visits, patient monitoring, and store-and-forward; technologies supporting telehealth delivery include broadband and wireless communication.³ Continued availability and promotion of telehealth services has the potential to play a vital role in increasing access to care beyond the COVID-19 pandemic.⁴

Despite telehealth's valid potential, there is growing concern that most of the telehealth innovations are not sustainable beyond the COVID-19 pandemic.⁵ Barriers for telehealth implementation include non-availability of appropriate technology, a lack of individual behavior or willingness to change, a lack of reimbursement for healthcare professionals and patients utilizing technologies, and organizational barriers that hinder implementation.⁵ In addition, access to available and affordable broadband connection is necessary to conduct most forms of

telehealth. Broadband refers to high-speed internet access that is “always on.” Broadband is an essential infrastructure that impacts every facet of a community including healthcare access.⁶ Currently, approximately 1.2 million Michigan households do not have permanent fixed broadband; most of these households are located in rural regions.⁷ Households including someone enrolled in Medicaid were nine percent less likely to have broadband access when compared with households without a Medicaid beneficiary.⁸ As such, this project focused specifically on audio-only telehealth due to its ability to provide access to individuals who do not have available or affordable broadband connection.

A policy agenda, as described by Kingdon, is a list of problems being considered by government officials.⁹ Kingdon’s Multiple Streams Framework has three streams that, although operating independently, eventually converge yielding a window of opportunity to push the agenda forward. Kingdon suggests that policy change, or the windows of opportunity “open infrequently and do not stay open long”.⁹

For policy change, clearly defining an urgent problem that decision makers with authority will notice and respond to is key. In the case of telehealth during the pandemic, the problem was clear; the need for healthcare did not stop despite stay-at-home orders aimed at reducing the spread of COVID-19. Looking beyond the pandemic, the change in problem stream is providing sustained reimbursement for audio-only telehealth. Kingdon’s policy stream can be described as the solution to the problem. With the COVID-19 pandemic, relaxations were introduced to increase reimbursement for audio-only telehealth services provided to Medicaid beneficiaries. The public or national mood conceptualizes the political stream in Kingdon’s framework. The national mood has less to do with hard data and more to do with perceptions or interpretation of an issue. During the pandemic, the national, and even global, mood was that of fear and, in many

cases, panic leading to an increased utilization of telehealth in order to avoid public exposure to COVID-19.

Kingdon's framework suggests the opportunity presents when all three streams align while an issue is urgent. Without urgency, Kingdon suggests stakeholders will cling to their individual positions rather than come to consensus. The more intense, widespread, and urgent the issue, the greater the chance the stakeholders will negotiate and reach a consensus. The pandemic provided a window of opportunity as described by Kingdon for policy change concerning the sustained reimbursement for audio-only telehealth.

For these reasons, more systemic examination of the usefulness of audio-only telehealth beyond the COVID-19 pandemic is needed to help inform state governments on adoption of audio-only telehealth reimbursement as permanent. The goal of this policy analysis was to explore current audio-only telehealth practices and policy activities to advocate for sustainability of audio-only telehealth beyond the COVID-19 pandemic.

Methods

A mixed-method design was used to help inform state legislators in Michigan on audio-only telehealth policy reform. Both quantitative and qualitative data were necessary to help present both the data and experience of administering audio-only telehealth during the pandemic. In addition, a policy analysis of other states was performed to help guide policy reform efforts in the State of Michigan. Institutional review board approval was obtained prior to conducting all aspects of this research.

Telehealth Visits at Rural Ambulatory Clinic

Adult patients ≥ 18 who were seen at the rural ambulatory clinic via tele-visit from April 2020 to May 2021 were included in the de-identified data collection. The number of patients at

the rural ambulatory clinic who utilized tele-visit services, their ages, type of telehealth modality utilized, and type of insurance coverage were collected via a report generated from the EHR. Telehealth modalities were categorized into either tele-health, tele-phonic, or tele-video visits. Tele-health visits were defined as patients located at one of the rural ambulatory clinic's distant sites receiving care via tele-video from a provider at the hub site. Tele-phonic visits were defined as care provided to a patient located at home via audio-only mechanisms. Tele-video visits were defined as care provided to a patient located at home via audio and video mechanisms. This clinic was chosen for data analysis because they were located in a rural region and were willing to participate in telling their story. Results were analyzed in Statistical Package for the Social Sciences (SPSS) using histograms.

Survey of Providers

Administration of the telehealth usability questionnaire to the providers in the rural ambulatory clinic occurred in May 2021. This survey evaluated the usability of telehealth implementation and services.¹⁰ The usability factors addressed include usefulness, ease of use and learnability, interface quality, reliability, and satisfaction and future use.¹⁰ Approval to use an adaptation of this published questionnaire was obtained from the primary author Parmanto. Survey questions included one dichotomous question, six 5-point Likert scale questions, and two open-ended questions. Convenience sampling was used since there was a limited number of physicians, physician assistants, and nurse practitioners at the rural ambulatory clinic. Results were analyzed in SPSS using chi-square statistics and p values.

State Policy and Bill Analysis

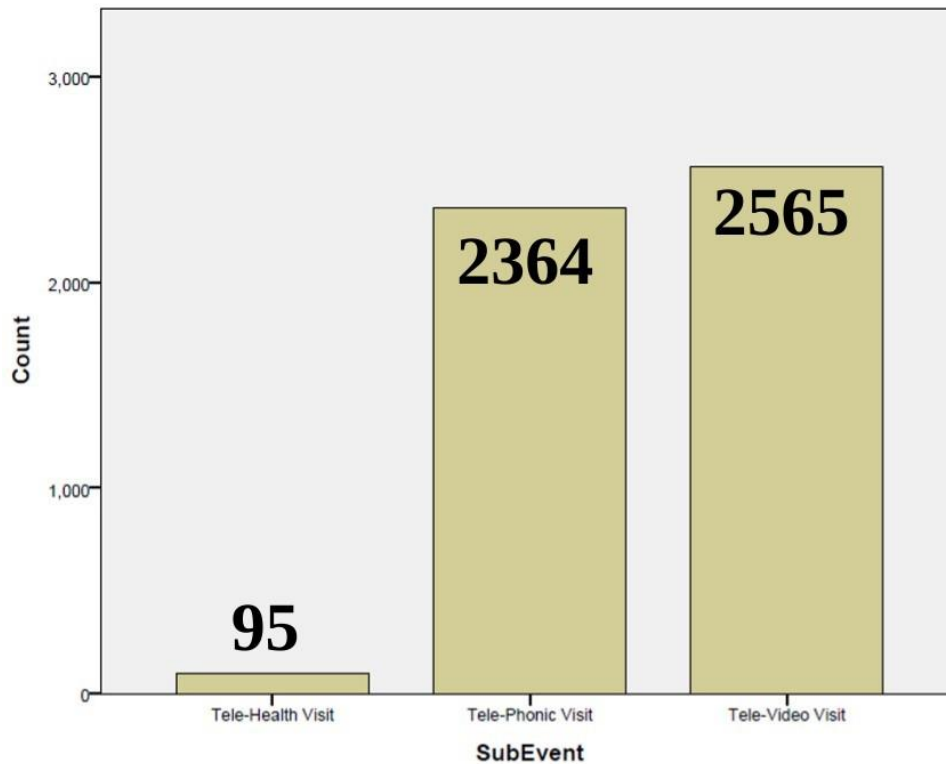
Telehealth policies and bills were assessed from states in the Upper Midwest and North Central Regional Telehealth Resource Centers. These states included Illinois, Indiana, Iowa,

Michigan, Minnesota, Nebraska, North Dakota, Ohio, South Dakota, and Wisconsin. Measures collected included policies and bills related to audio-only telehealth reimbursement before, during, and after the COVID-19 pandemic. This data was obtained by scoping the Regional Telehealth Resource Center and Center for Connected Health Policy websites to identify past and current policies and scanning Legiscan with the keyword “audio only” to identify future, proposed bills.¹¹

Results

The regional ambulatory clinic has approximately 100,000 patient visits each year with 9% of this population served being Medicaid beneficiaries. During the data collection period, there were just over 5,000 tele-visits conducted. For all tele-visits, 64% of patients were 65 and older. For only telephonic visits, 73% were 65 and older. As such, there is a greater need for this modality in the 65+ population. Table 1 depicts the subcategory of telehealth provided to patients from April 2020-May 2021. From this data, it is clear that almost half of all patients receiving telehealth during the data collection period benefited from an audio-only mechanism. Telephonic visits were utilized almost 50% of the time; this equates to almost 2,400 patients who may not have otherwise received care and may have avoided complications.

Table 1 Total Telehealth Visits from April 2020-May 2020 Broken Down by Modality



The modified telehealth usability questionnaire was administered to 16 providers at the clinic with a response rate of six. Table 2 visualizes the quantitative results from the provider survey. With such a low response rate, none of the quantitative survey results can be considered statistically significant. In the future, this survey should be submitted to providers at offices that serve a larger Medicaid population and to larger provider groups to ensure more data points. The qualitative questions included “What is one barrier that would limit your use of audio-only telehealth?” and “Any additional comments?” Themes with regards to the barriers that limit audio-only telehealth use according to providers at the rural ambulatory clinic included a lack of reimbursement, inability to perform a physical exam, and technology limitations.

Table 2 Chi-Square Statistic and P Value for Each Quantitative Survey Question (N = 6)

Question	Chi-Square Statistic	P Value
Audio-only telehealth saves me time traveling to a hospital or specialist clinic.	0.667	0.881

It is simple to use audio-only telehealth.	3	0.223
I like using audio-only telehealth.	0	1
I could easily talk to the patient using the audio-only telehealth system.	3	0.223
I think the visits provided over the audio-only telehealth system are the same as in-person visits.	0	1
Audio-only telehealth is an acceptable way to administer healthcare services.	3	0.223
I would use audio-only telehealth after the pandemic is over.	0.667	0.414

Legislation in ten states were evaluated for proposed continuation of audio-only telehealth reimbursement beyond the COVID-19 pandemic. Each have varying degrees of care that is planned to be covered, except for the State of Michigan, with most proposing that all care provided via audio-only telehealth be covered, provided it can be performed the same as in-person care (See Table 3). Two themes were identified from the analysis with regards to the type of care that is planned to be covered after the pandemic in each state. This included behavioral health services and all care, provided it can be performed the same as in-person care. Behavioral health was indicated in only two states including Nebraska and Wisconsin whereas North Dakota, Minnesota, Iowa, Illinois, Indiana, and Ohio have proposed coverage of all care, provided it can be performed the same as in-person care. South Dakota has not indicated, yet, what type of care will be covered post pandemic. Each state is in a different stage of approval within the legislature. Because every state has varying degrees of language with regards to their bill and definition of telehealth, ongoing analysis will be necessary to determine if the ongoing telehealth coverage is considered across these states.

Table 3 Proposed Bills in Each State to Continue Reimbursement for Audio-Only Telehealth

North Central States

<u>Plans for Continuation of Audio-Only Reimbursement After COVID-19</u>			
State	Yes/No/ Proposed for?	What type of care is reimbursed	Bill #
North Dakota	Proposed	All care, provided it can be performed the same as in-person care	ND 1465
South Dakota	Proposed	Not defined yet	SD SB96
Nebraska	Proposed	Individual behavioral health services	NE LB400
Minnesota	Proposed	All care, provided it can be performed the same as in-person care	MN HF1412
Iowa	Proposed	All care, provided it can be performed the same as in-person care	IA HF431
Wisconsin	Proposed	Mental health therapy	WI SB306

Upper Midwest States

<u>Plans for Continuation of Audio-Only Reimbursement After COVID-19</u>			
State	Yes/No/ Proposed for?	What type of care is reimbursed	Bill #
Illinois	Proposed	All care, provided it can be performed the same as in-person care	IL HB3759
Michigan	No	NA	NA
Indiana	Proposed	All care, provided it can be performed the same as in-person care	IN HB1286
Ohio	Proposed	All care, provided it can be performed the same as in-person care	OH HB122

Discussion

In the literature, audio-only telehealth contributed to improved patient outcomes, lower cost of care, improved equity and access to care, improved patient and clinician satisfaction, enhanced communication between the clinician and patient, and improved knowledge uptake.^{12,13,14,15,16,17,18} Likewise, the findings from the provider survey for this project found similar results with regards to improved equity and access to care, improved clinician satisfaction, enhanced communication, and improved knowledge uptake. With expanded access and improved reimbursement policies in place, as well as ongoing acceptability by patients and healthcare providers, audio-only telehealth will continue to serve as an important modality for delivering care during and after the pandemic.

Findings of this project have important implications for state policy reform. The qualitative data collected from the surveys showed promising feedback with regards to respondents' willingness to utilize audio-only telehealth after the pandemic. Respondents also agreed that audio-only telehealth should not replace in-person visits and would be most beneficial for scenarios where care could be provided through audio-only telehealth the same as it could have been provided in person. The results from the EHR audit were also beneficial in understanding how often each type of tele-visit was utilized. This data highlighted the fact that audio-only telehealth has been utilized almost 50% of the time throughout the pandemic at this rural ambulatory clinic. Finally, based on the state policy analysis, it is clear that most states in the Upper Midwest and North Central states are planning to reimburse for all care, provided it can be performed the same as in-person care.

The vision of the Michigan Department of Health and Human Services (MDHHS) is to

deliver health and opportunity to all Michiganders, reducing intergenerational poverty and health inequity.² The biggest opportunity for MDHHS is to align their vision by continuing reimbursement for audio-only telehealth permanently.² By doing so, households without access to broadband will continue to have access to telehealth. As of June 2019, there were 2.4 million Michigan residents receiving Medicaid; this is about 24% of the population in Michigan that could benefit from this expansion.^{19,20} Based on the findings of this project and the results of the literature review, the recommendation should be made to the State of Michigan to continue providing reimbursement post-pandemic to Medicaid beneficiaries for audio-only telehealth provided it can be performed the same as in-person care.

Limitations

This study is limited by the small sample size of survey respondents. In addition, the data collected on patients at the rural ambulatory clinic were primarily ≥ 65 years of age which made it difficult to apply these findings solely to Medicaid patients. Finally, comparing state policies and bills was difficult as each proposed bill had varying definitions of telehealth and the wording in the bills varied greatly from state to state.

Conclusions

The results of this study shed light on the usefulness of audio-only telehealth beyond the COVID-19 pandemic. With expanded access and improved reimbursement policies in place, as well as ongoing acceptability by healthcare providers, audio-only telehealth will continue to serve as an important modality after the pandemic. Future research is needed to understand the experience and usability of audio-only telehealth by providers due to the low response rate in this study. Future policy analysis is needed to assess the evolution of bills and

policies in each state as the public health emergency ends.

Telehealth Policy Analysis: Recommendations to Improve Medicaid Reimbursement in Michigan

Adelheid K. Fisher

DNP Project Final Defense

July 16, 2021



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- Site Mentor:
Carol Baker, MSN, RN

Objectives for Presentation

1. Present the background information to support the need for the project
2. Present findings from the organizational assessment and literature review
3. Explain the clinical practice question and the project purpose
4. Present the project plan, results, and key takeaways
5. Discuss the dissemination plan

Introduction

- Prior to the pandemic, many definitions of telehealth excluded telephone visits (Uscher-Pines et al., 2021).
- Telephone visits peaked in April 2020 comprising 65.4% of total primary care visits within 43 health centers in California (Uscher-Pines et al., 2021).
- Elimination of reimbursement for audio-only telehealth could result in disproportionate access to care and health inequity for Medicaid beneficiaries (Drees, 2021).

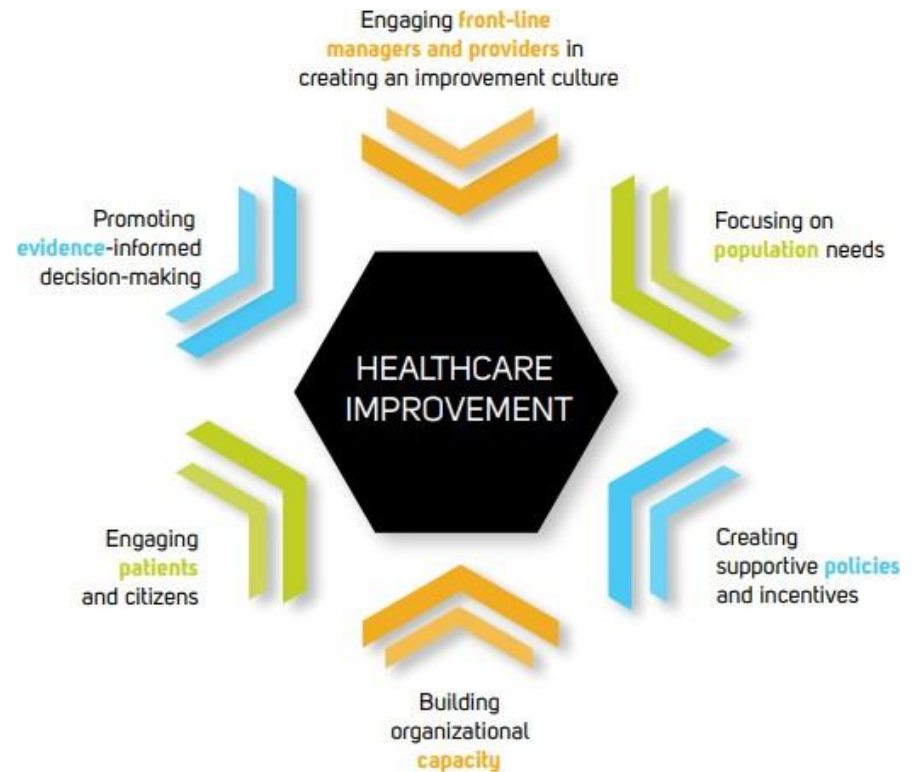
Assessment of the Organization

Macro level: State of Michigan/MDHHS

Micro level: Regional cancer network in Northwest lower Michigan



Canadian Framework for Healthcare Improvement Assessment Tool (2014)



Current State of the State

- Prior to the pandemic, Medicaid in Michigan reimbursed only for live, interactive video (CCHP, 2020)
- During the pandemic, audio-only telehealth is reimbursable
- Post-pandemic, there is no plan to make audio-only telehealth reimbursable (MDHHS, 2020b)



SWOT Analysis

Strengths

- **Appetite for change due to COVID-19; there is interest in adopting audio-only telehealth as permanent by both the macro- and micro-site (MDHHS, 2020b)**
- Medicaid in Michigan has provided more high quality, accessible, and timely medical services than in the previous year (MDHHS, 2020c)
- The microsite has been using audio-only telehealth since the pandemic started and hopes to continue using it
- Support from Governor Gretchen Whitmer and Michigan Legislators (The Office of Governor Gretchen Whitmer, 2020)

Weaknesses

- Lack of CAHPS data on the type of telehealth care provided and the experience of those telehealth services (MDHHS, 2020a)
- **No assurance that Medicaid will sustain reimbursement for audio only services after COVID-19 pandemic (UMTRC, 2020)**
- Medicaid in Michigan only reimburses for live, interactive video; other states reimburse for live video, store-and-forward, and remote patient monitoring (CCHP, 2020)

SWOT Analysis

Opportunities

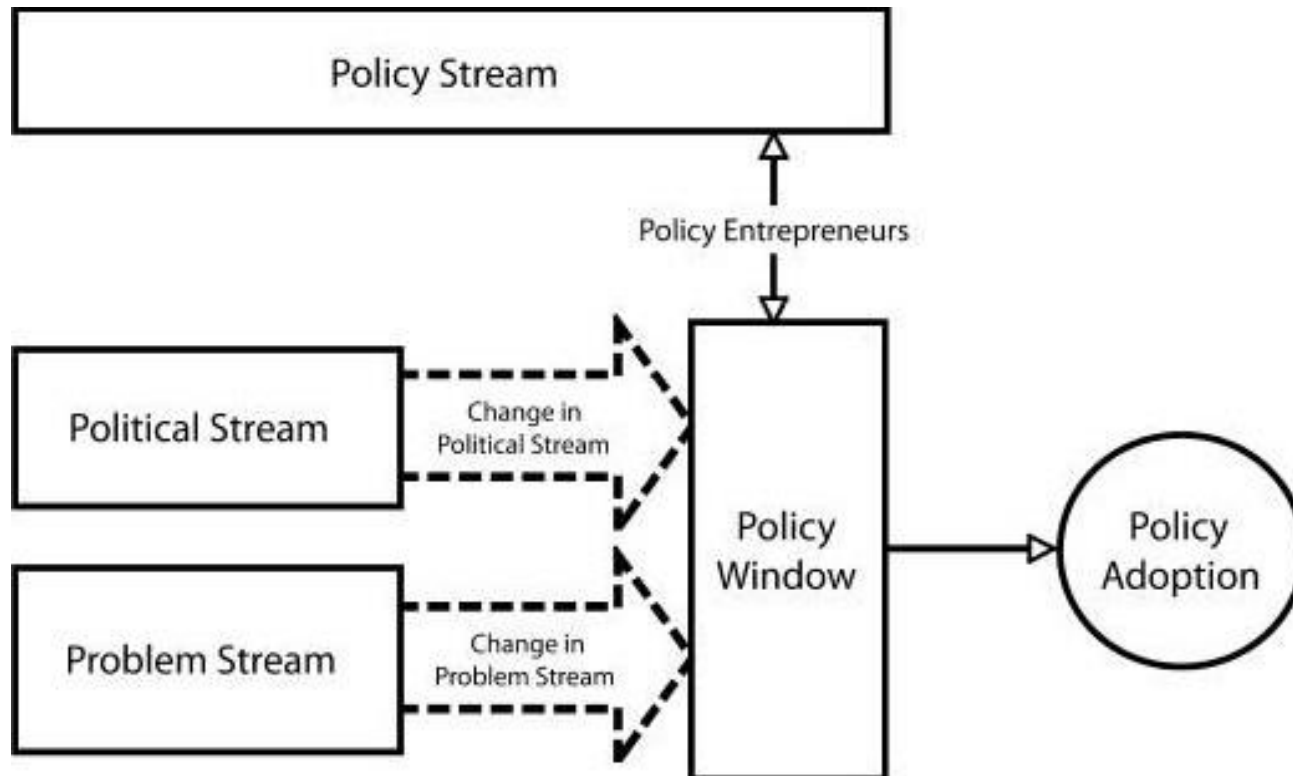
- **Reduce health inequity and improve access through the expansion of telehealth reimbursement** (MDHHS, 2020b)
- 2.1 million Medicaid recipients in the state of Michigan that could benefit from expanded telehealth reimbursement (MDHHS, 2021)
- Prenatal care and pediatric care telehealth expansion is a key area of opportunity for the Michigan Medicaid managed care program (MDHHS, 2020c)

Threats

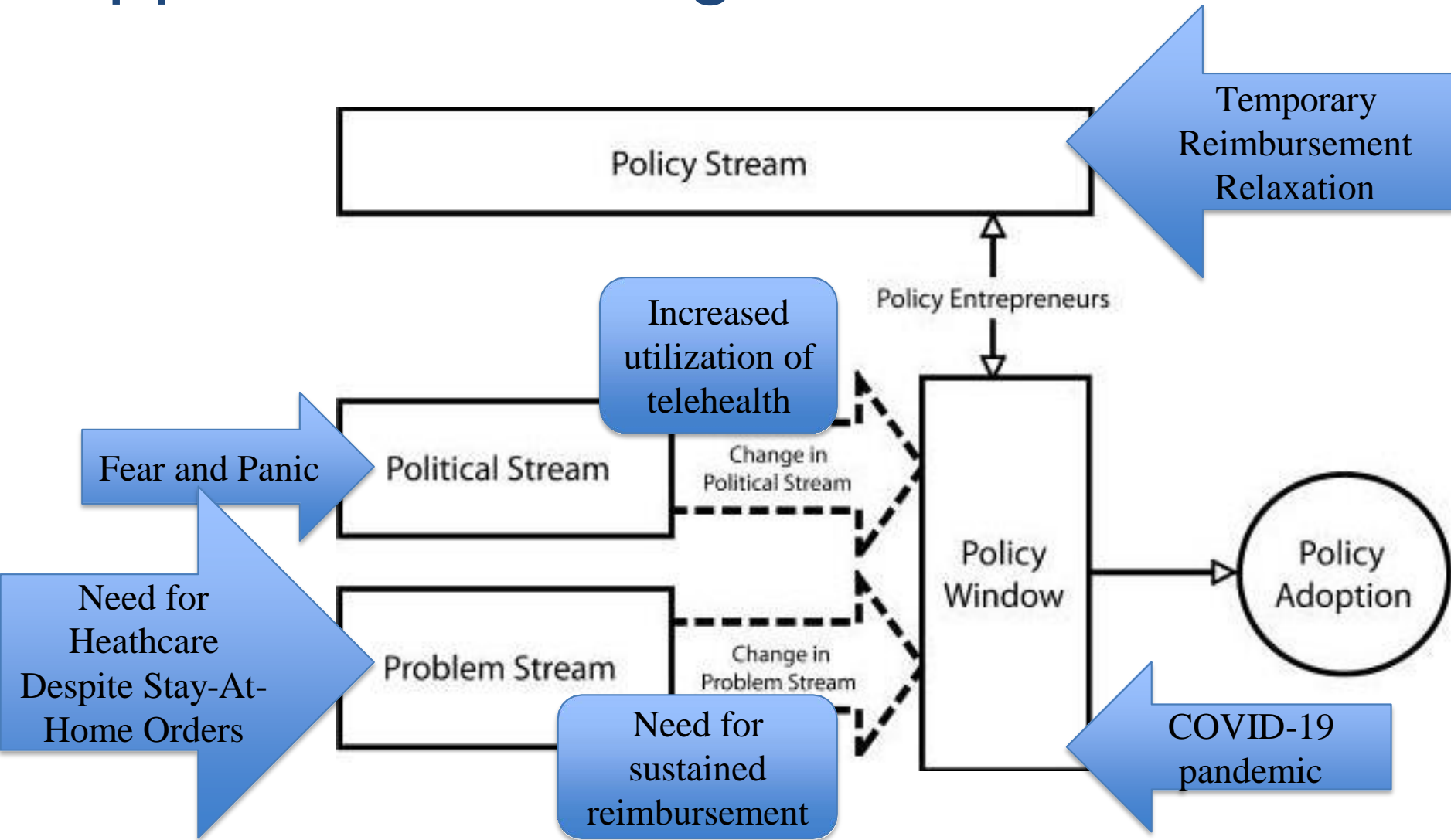
- Michigan Medicaid has not expanded telehealth reimbursement for store-and-forward and remote patient monitoring when other states are reimbursed for these services; expansion could result in increased utilization and costs (CCHP, 2020)
- **There are some concerns that telephone visits could result in fraud, abuse, and unnecessary and lower-quality care** (Uscher-Pines et al., 2021)
- CMS indicated they may stop reimbursing for telephone visits when the public health emergency ends

Framework/Conceptual Model for Phenomenon

- **Kingdon's Multiple Streams Framework (Giese, 2020)**



Application of Kingdon's Framework



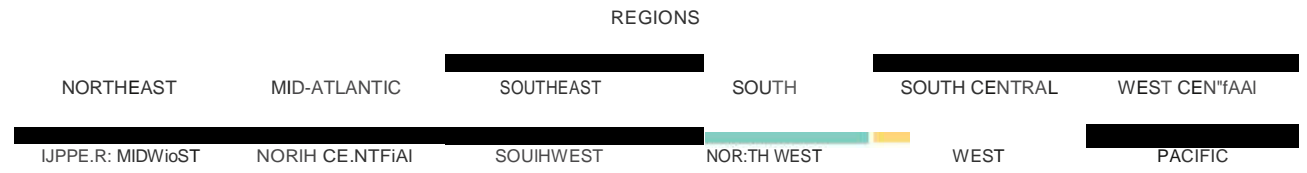
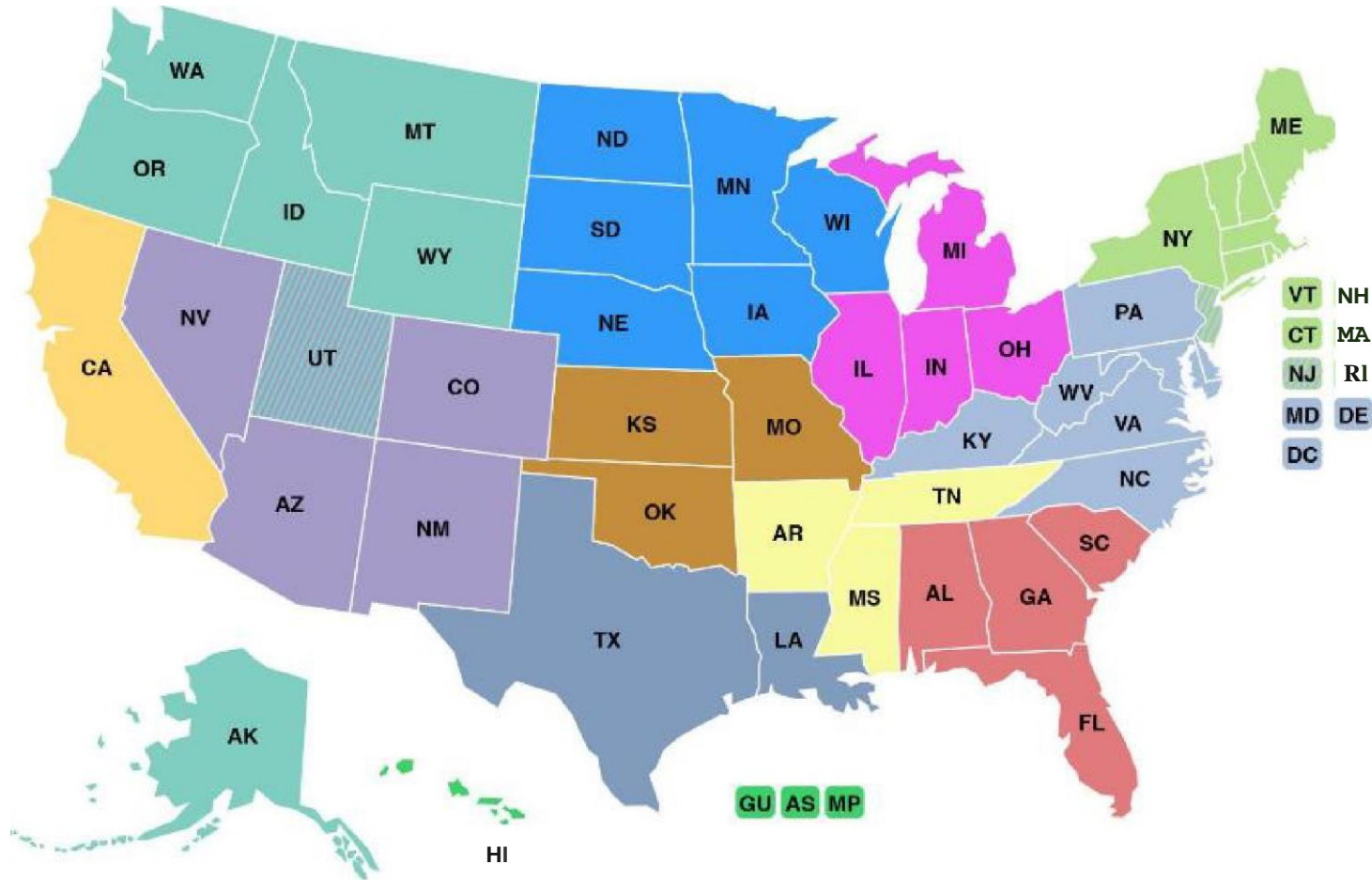
Key Stakeholders

- Medicaid beneficiaries
- Healthcare providers caring for Medicaid beneficiaries
- Local Michigan Medicaid advocacy groups
- MDHHS director
- Michigan governor and legislators

Project Purpose & Objectives

- Collect data on telehealth visits
 - EHR data
 - Survey data
- Review policies related to audio-only telehealth reimbursement for Medicaid beneficiaries within the Upper Midwest and North Central states

Telehealth Resource Centers



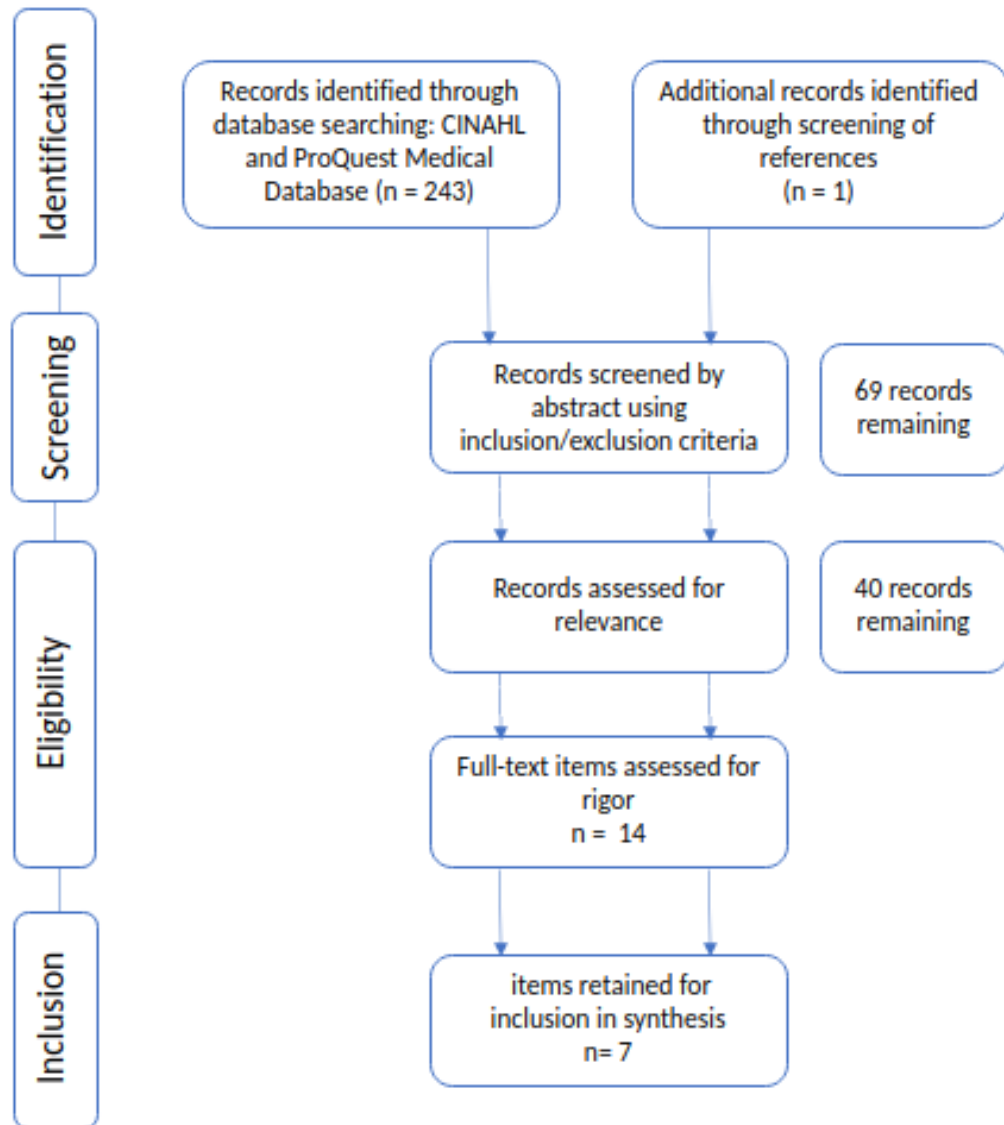
Clinical Practice Question

What clinician perceptions and information need to be included in a health policy brief to inform stakeholders about audio-only telehealth reimbursement for Medicaid beneficiaries in the State of Michigan?

Ethical Considerations

- IRB approval obtained (IRB letter available upon request)
- Data de-identified
- Implied consent obtained from survey participants prior to dissemination of survey
- State policy data collection was all publically available data

PRISMA Figure, Purpose, and Aims



(Moher et al., 2009)

Literature Review Purpose

- Does telehealth administered via audio-only mechanisms improve patient outcomes?
- Does telehealth administered via audio-only mechanisms contribute to improved clinician and/or patient satisfaction?

Literature Review: Quantitative Studies

Author/Year	Design (n)	Intervention	Outcome
Adhikari et al. (2020)	Retrospective study (n = 15)	Telephone-based telephysiotherapy	Repeated measures ANOVA determined that mean Numeric Pain Rating Scale for pain at rest ($p = 0.04$), pain at worst ($p < 0.001$), pain during ADL ($p < 0.001$), and pain during occupation ($p = 0.001$) improved after telephone-based telephysiotherapy.
Oddone et al. (2017)	Randomized control trial (n = 417)	Telephone-delivered health coaching vs. no coaching after health risk assessment	Logistic regression was used to evaluate telephone delivered health coaching with reported higher rates of enrollment ($p < 0.0001$) and participation ($p = 0.0004$) in a prevention program.
Voils et al. (2018)	Randomized control trial (n = 38)	Genetic counseling via telephone or video	Knowledge uptake after both telephone and televideo genetic counseling improved ($p = 0.2$). Televideo patients required a 2.8 hr. medium travel time compared to 0 hr. for telephone patients.

Literature Review: Qualitative Studies

Author/Year	Design (n)	Intervention	Themes Identified
Egerton et al. (2017)	Structured interviews (n = 11)	Telephone-delivered care support for knee osteoarthritis management	affordability, practicability (efficiency of referral and communication quality), effectiveness, acceptability (satisfaction), safety/side effects, and equity
Faija et al. (2020)	Structured interviews (n = 34)	Telephone psychological therapy	knowledge, skills, beliefs about capabilities, beliefs about consequences, emotions (satisfaction), professional role, social influences (communication), and environmental context and resources
Fournier et al. (2018)	Systematic review (n = 7)	Telephone genetic counseling vs. in-person genetic counseling	hereditary breast and ovarian cancer knowledge, psychological outcomes, genetic testing uptake, patient–counselor communication, cost, and patient satisfaction
Imlach et al. (2020)	Structured interviews (n = 38)	Accessibility to telehealth (both telephone and video)	ability to reach (convenience), ability to pay (affordability), and ability to engage (ease of technology use)

Results: Literature Review

- Efficacy of audio-only telehealth best practices:
 - Patient outcomes
 - Cost of care
 - Equity and access to care
 - Patient & clinician satisfaction
 - Communication between the clinician and patient
 - Knowledge uptake

Project Design

- Policy Analysis
 - Evaluation of the historical evolution of the policy and determination if there is still congruence within the context of the current social landscape
 - This review will focus on both macro-level and micro-level issues (Moran et al., 2020)
- Bardach's Eightfold Path
 - Use this 8 step problem-solving approach to clarify the problem and identify alternatives/solutions

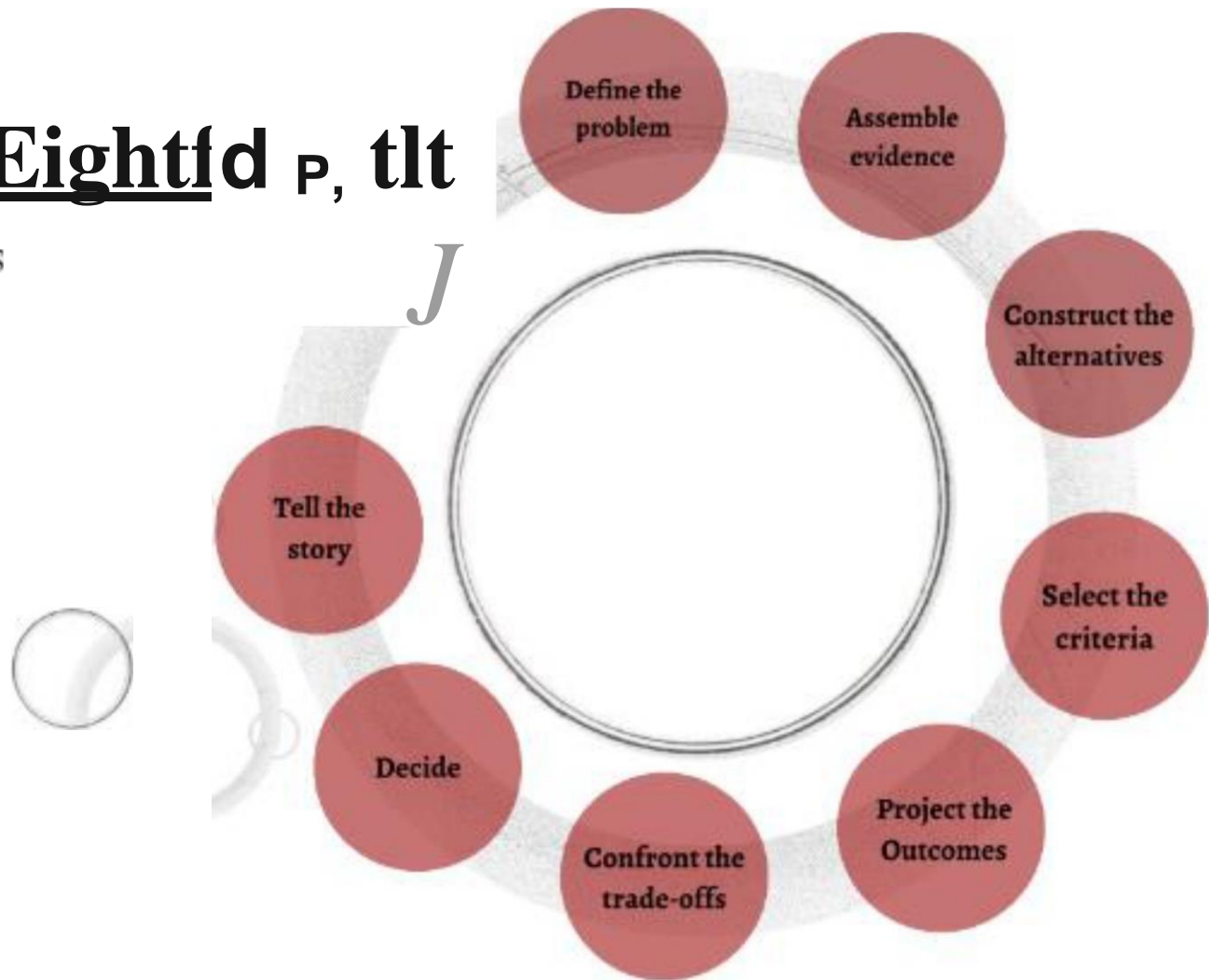
Setting and Participants

- Setting
 - Micro level: regional ambulatory clinic in rural Michigan
 - Macro level: State of Michigan/MDHHS
- Participants
 - Medical oncology providers
 - Medicaid beneficiaries at the microsite
 - Microsite business manager and director

Implementation Model

Bardach's Eightfold Path

FOUR PHASES OF POLICY ANALYSIS



(Bardach, 2000)



Implementation Steps and Strategies: Bardach's Eightfold Path

Step 1: Define the Problem

Description	Implementation
<ul style="list-style-type: none">• Gives a reason for the work and guides the evidence-gathering (Bardach, 2000)	<ul style="list-style-type: none">• Organizational assessment• Literature review• Assess for readiness and identify barriers and facilitators (Powell et al., 2015)• Conduct local needs assessment (Powell et al., 2015)

Implementation Steps and Strategies: Bardach's Eightfold Path

Step 2: Assemble Some Evidence

Description	Implementation
<ul style="list-style-type: none">• Involves time spent gathering data• Purpose is to accumulate evidence that will have an impact on existing beliefs (Bardach, 2000)	<ul style="list-style-type: none">• Analysis of state practices in the North Central and Upper Midwest regions• Accumulated data on the prevalence of audio-only telehealth use at the microsite• Administered a survey to medical oncology providers to evaluate their satisfaction with audio-only telehealth and willingness to continue audio-only telehealth• Obtain and use consumer feedback and use data experts (Powell et al., 2015)

Implementation Steps and Strategies: Bardach's Eightfold Path

Step 3: Construct the Alternatives

Description	Implementation
<ul style="list-style-type: none">Construct the alternative course of action or policy option (Bardach, 2000)	<ul style="list-style-type: none">The alternatives being considered are to continue or not continue the temporary policies in place for audio-only telehealth reimbursementDevelop a formal implementation blueprint (Powell et al., 2015)

Implementation Steps and Strategies: Bardach's Eightfold Path

Step 4: Select the Criteria

Description	Implementation
<ul style="list-style-type: none">• What are the evaluation criteria?• Is this projected outcome good or bad for the population (Bardach, 2000)?	<ul style="list-style-type: none">• Equity criteria: How often is audio-only telehealth made available to Medicaid patients at the microsite?• Develop and organize quality monitoring systems (Powell et al., 2015)

Implementation Steps and Strategies: Bardach's Eightfold Path

Step 5: Project the Outcomes

Description	Implementation
<ul style="list-style-type: none">• It is important to be realistic when considering the outcome measures.• It is impossible to be accurate regarding future results (Bardach, 2000)	<ul style="list-style-type: none">• The vision of MDHHS is to reduce inequity and enhance sustainability of healthcare access for Medicaid beneficiaries in the state of Michigan.• Inform local opinion leaders (Powell et al., 2015)

Implementation Steps and Strategies: Bardach's Eightfold Path

Step 6: Confront the Trade-Offs

Description	Implementation
<ul style="list-style-type: none">• What are the projected outcomes for each of the alternatives?• What are the unintended consequences (Bardach, 2000)?	<ul style="list-style-type: none">• Fraud• Abuse• Unnecessary and lower-quality care• HIPPA violations (Uscher-Pines et al., 2021)• Change the liability laws (Powell et al., 2015)

Implementation Steps and Strategies: Bardach's Eightfold Path

Step 7: Decide!

Description	Implementation
<ul style="list-style-type: none">• Which of the alternatives is the best option to solve the problem (Bardach, 2000)?	<ul style="list-style-type: none">• The alternative being proposed is to continue audio-only telehealth reimbursement for Medicaid beneficiaries in Michigan• Conduct local consensus discussions (Powell et al., 2015)

Implementation Steps and Strategies: Bardach's Eightfold Path

Step 8: Tell Your Story	
Description	Implementation
<ul style="list-style-type: none">Tell the story to the identified stakeholders and advocacy groups (Bardach, 2000)	<ul style="list-style-type: none">Health policy briefInform local opinion leaders including legislatures and MDHHS (Powell et al., 2015)Present to UMTRC conferencePrepare patients/consumers to be active participants (Powell et al., 2015)

Evaluation and Measures

- Findings from EHR chart review
- Survey of providers that addresses satisfaction with audio-only telehealth and willingness to continue utilizing audio-only telehealth
- Findings from state policy analysis on telehealth reimbursement practices in Upper Midwest and North Central states by scoping:
 - Regional telehealth resource centers and Center for Connected Health Policy
 - Legiscan with key word “audio only”

Evaluation and Measures Continued

Topic	Concept	How Measured	When Measured	Who Measures
Implementation Strategies	Assess for change readiness	Discussion, EHR audit, observation	Pre implementation	Student and Business Manager
	Engage Stakeholders	Discussion	Pre implementation	Student
	Identify change agent	Discussion	Pre implementation	Student and Business Manager
Patient Outcomes	Equity at micro-level	EHR audit	Implementation	Student
	Healthcare access at micro-level	EHR audit	Implementation	Student
System Outcome	Willingness to continue use of audio-only telehealth at the micro-level	Implementation Survey	Implementation	Student
Regional Outcome	Compare other state's policies at the macro-level	Policy audit	Implementation	Student
Policy Outcome	Create a policy brief regarding audio-only telehealth	Policy audit, implementation survey, and EHR audit	Post implementation	Student

Analysis Plan

- Surveys and EHR data were assessed for statistical significance using SPSS data software
- The state policy analysis were presented in Excel format in order to give a visual depiction of the differences between these states

Proposed Budget & Resources

Cost Mitigation if one patient does not need to drive to their appointment:

Average of 100 miles roundtrip to travel to microsite to seek care in person x 55.5 cents/mile reimbursement	\$55.50
--	----------------

EXPENSES

BUDGET

ACTUAL

Project manager time at micro-site and state level (in-kind donation) 250 hrs x \$37/hr	(\$9,250)	(\$9,250)
---	------------------	------------------

Note: time is based on the average salary of a project manager

Consultations (in-kind donation)	(\$5,000)	(\$5,000)
----------------------------------	------------------	------------------

Meetings with project advisor and committee members

Note: based on average nursing faculty and administrator salaries.

Loss of productivity due to stakeholder surveys	\$500	\$500
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Providers (medical oncology physicians, NPs, and/or PAs)

Note: based on average physician salary

Legislator (net zero time) and ANA-MI staff time (in-kind donation) to read policy brief	(\$140)	(\$140)
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Note: based on average legislator salary

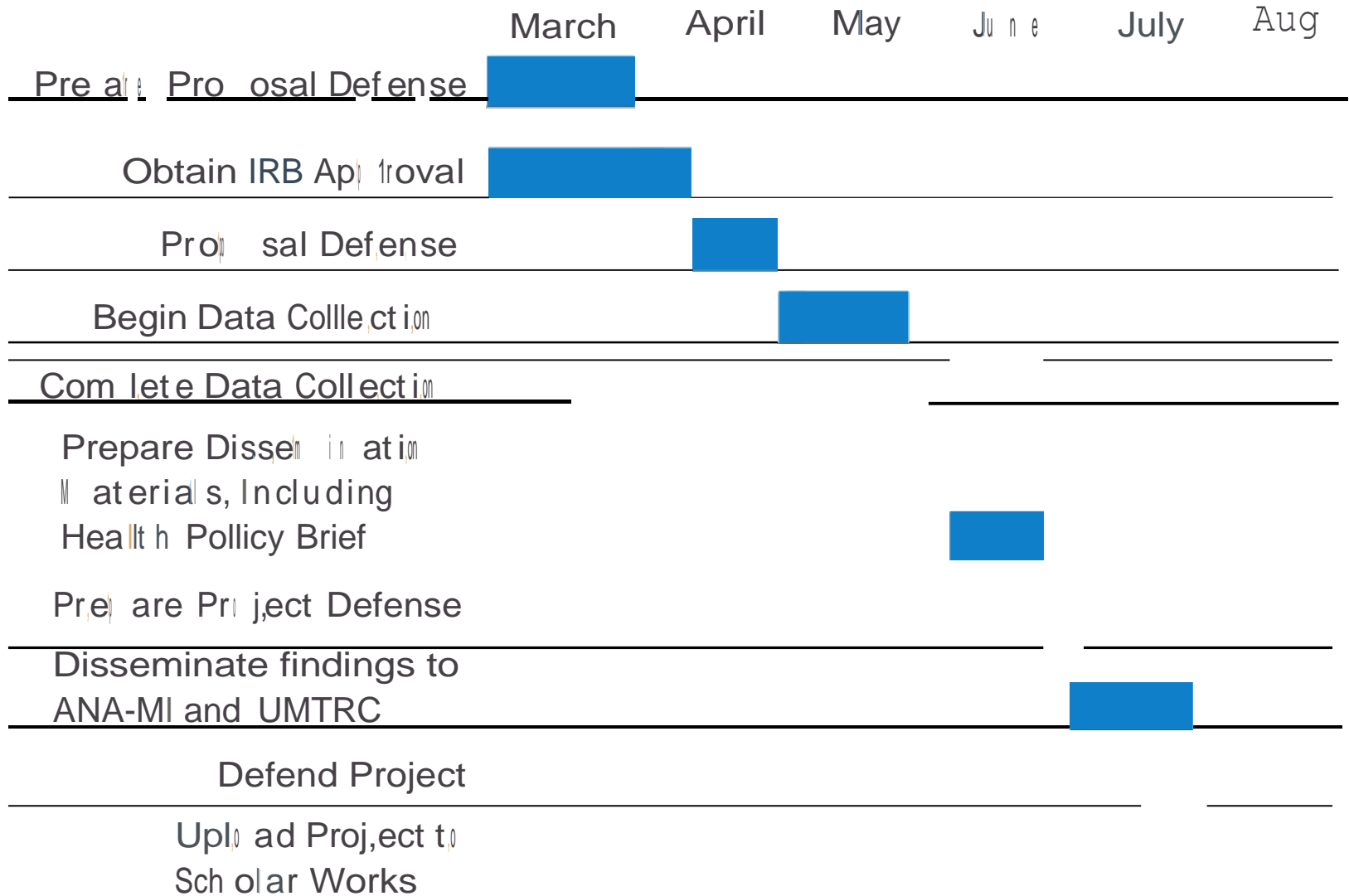
TOTAL EXPENSES

\$500

Cost Mitigation if 1000 patients receive telehealth at home	\$55,500
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\$55,500

Gantt Chart: March 2021-August 2021

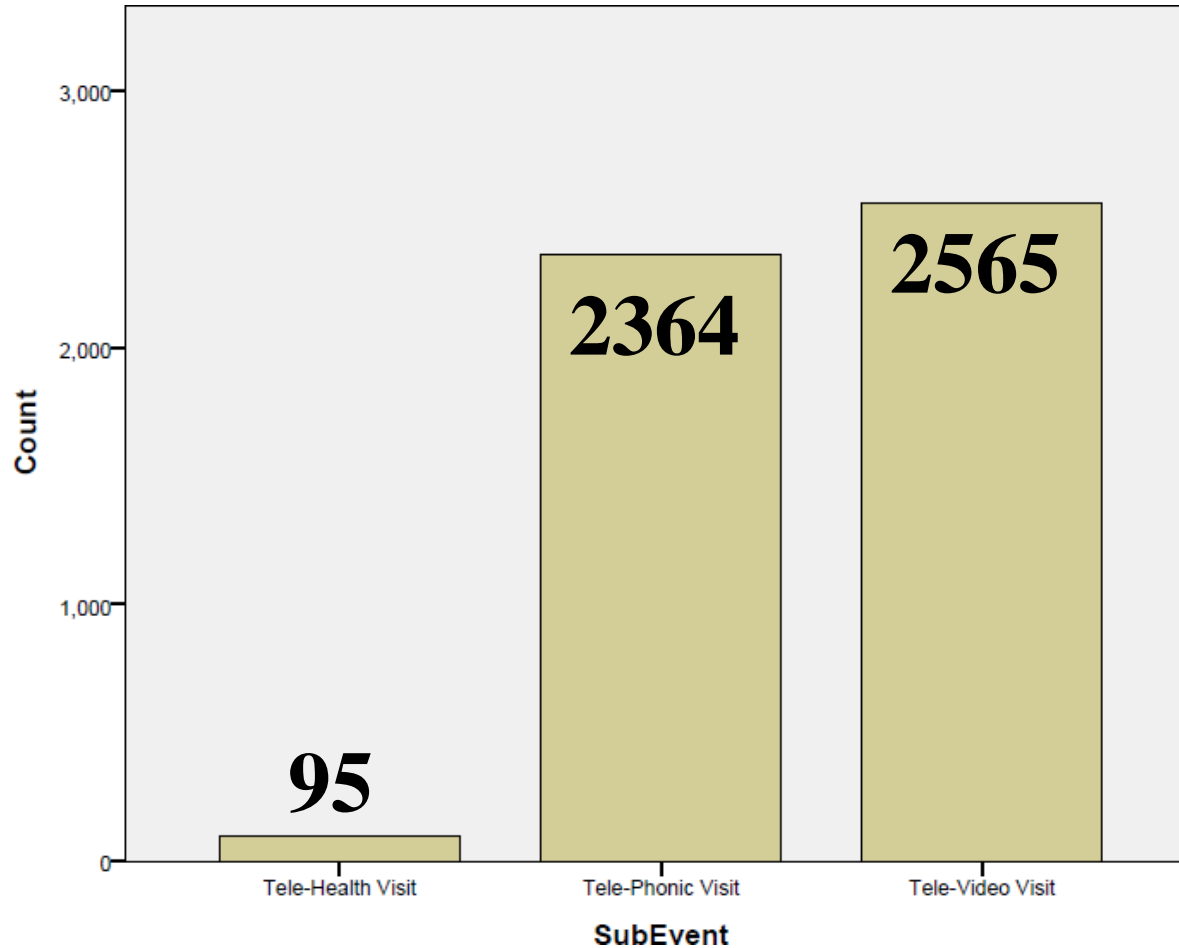


Results

- Visit summary from ambulatory clinic:
 - Almost 100,000 total patient visits annually
 - 5,024 tele-visits from 4/1/2020-5/21/2021
- Demographics:
 - 64% of patients who utilized tele-visits were 65 and older
 - 73% of patients who utilized audio-only telehealth were 65 and older

Results

Tele Visits for All Patients at Ambulatory Clinic



Quantitative Survey Results Ambulatory Clinic

Response rate: 6/16

(Parmanto et al., 2016)

	Strongly Agree	Agree	Neutral	Disagree	Strongly Disagree
Audio-only telehealth saves me time traveling to a hospital or specialist clinic.	2	1	2	1	0
It is simple to use audio-only telehealth.	1	4	1	0	0
I like using audio-only telehealth.	0	2	0	2	2
I could easily talk to the patient using the audio-only telehealth system.	1	4	1	0	0
I think the visits provided over the audio-only telehealth system are the same as in-person visits.	0	0	0	3	3
Audio-only telehealth is an acceptable way to administer healthcare services.	0	0	4	1	1
	Yes	No			
I would use audio-only telehealth after the pandemic is over.	4	2			

Quantitative Survey Results

	Audio-only telehealth saves me time traveling to a hospital or specialist clinic.	It is simple to use audio-only telehealth.	I like using audio-only telehealth.	I could easily talk to the patient using the audio-only telehealth system.	I think the visits provided over the audio-only telehealth system are the same as in-person visits.	Audio-only telehealth is an acceptable way to administer healthcare services.	I would use audio-only telehealth after the pandemic is over.
Chi-Square	0.667	3	0	3	0	3	0.667
p value	0.881	0.223	1	0.223	1	0.223	0.414

Qualitative Survey Results

- What is one barrier that would limit your use of audio-only telehealth?
 - Reimbursement
 - Inability to perform physical exam
 - Technology limitations
- Additional comments:
 - Useful for certain scenarios (follow-up care and education)
 - Cannot replace an in-person physical assessment

Policy Analysis Results



- Upper Midwest: 4 states; only Michigan does not have proposed legislation
- North Central: all 6 states have proposed bills

Policy Analysis Results

Behavioral health only	All care, provided it can be performed the same as in-person care
Nebraska	North Dakota
Wisconsin	Minnesota
	Iowa
	Illinois
	Indiana
	Ohio
South Dakota: not indicated	

North Central States

Plans for Continuation of Audio-Only Reimbursement After COVID-19

State	Yes/No/Proposed	What type of care is reimbursed for?	Bill #
North Dakota	Proposed	All care, provided it can be performed the same as in-person care	ND 1465
South Dakota	Proposed	Not defined yet	SD SB96
Nebraska	Proposed	Individual behavioral health services	NE LB400
Minnesota	Proposed	All care, provided it can be performed the same as in-person care	MN HF1412
Iowa	Proposed	All care, provided it can be performed the same as in-person care	IA HF431
Wisconsin	Proposed	Mental health therapy	WI SB306

Upper Midwest States

Plans for Continuation of Audio-Only Reimbursement After COVID-19

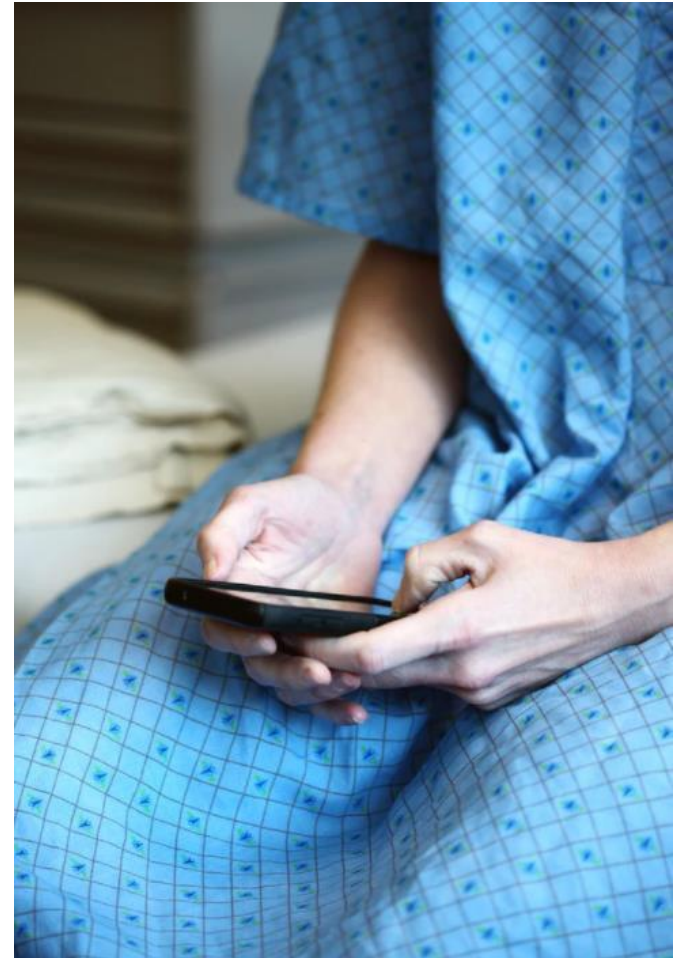
State	Yes/No/ Proposed	What type of care is reimbursed for?	Bill #
Illinois	Proposed	All care, provided it can be performed the same as in-person care	IL HB3759
Michigan	No	NA	NA
Indiana	Proposed	All care, provided it can be performed the same as in-person care	IN HB1286
Ohio	Proposed	All care, provided it can be performed the same as in-person care	OH HB122

Limitations

- Survey sample size
- Lack of Medicaid patients at implementation site due to age of patients treated
- Variation in bills related to telehealth from state to state

Recommendations for Michigan

- Policy recommendation based on the data
 - Continue audio-only telehealth beyond the COVID-19 pandemic
 - Propose that all care be reimbursed for, provided it can be performed the same as in-person care



Sustainability Plan

- Sustainability is achieved through:
 - Dissemination of health policy brief (see appendix)
 - ANA-Michigan chapter
 - UMTRC
 - Michigan State Senator and State House Representative
 - Publication in Journal of Rural Health
- Success is largely determined by the impact these dissemination materials have on the stakeholder and advocacy groups

A Call to Action

- Medicaid beneficiaries are at risk for inequitable and inaccessible care (UMTRC, 2020)
- A policy window is open now to push forward policy adoption (Giese, 2020)
- Stakeholders have an opportunity to advocate for sustained reimbursement of audio-only telehealth

Reflections on the DNP Essentials



Essential	Example
I: Scientific Underpinnings for Practice	Literature review
II: Organizational and Systems Leadership for Quality Improvement and Systems Thinking	Organizational assessment of the ambulatory clinic and MDHHS
III: Clinical Scholarship and Analytical Methods for Evidence-Based Practice Competencies	Data collection and analysis

Reflections on the DNP Essentials

Essential	Example
IV: Information Systems/Technology and Patient Care Technology for the Improvement and Transformation of Healthcare	Data evaluation and analysis
V: Health Care Policy for Advocacy in Health Care	Advocating for policy reform by presenting to the key stakeholders and advocacy groups
VI: Interprofessional Collaboration for Improving Patient and Population Health Outcomes	Collaboration with stakeholders at microsite
VII: Clinical Prevention and Population Health for Improving the Nation's Health Competencies	Goal of this project was to improve access to care for Medicaid beneficiaries
VIII: Advanced Nursing Practice	Evaluating the link between practice and policy reform

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Survey Approval

From: [Adelheid Fisher](#)

Sent: Sunday, April 18, 2021 1:30 PM

To: [Parmanto, Bambang](#)

Subject: Telehealth Usability Questionnaire

Hi Dr.

I am a doctoral candidate at Grand Valley State University's Kirkhof College of Nursing completing a scholarly project on policy advocacy for audio-only telehealth reimbursement beyond the COVID-19 pandemic. I am in the process of developing a questionnaire for clinicians who currently utilize telehealth to better understand their experience in using audio-only telehealth over the past year and happened upon your article, "Development of the Telehealth Usability Questionnaire." I am hoping to receive permission to utilize a modification of your survey that takes into account the six usability attributes of a telehealth system. Let me know what else you may need from me in order to obtain permission to utilize your survey.

I look forward to hearing from you.

Sincerely,
Adelheid Fisher, RN, B -

From: [<pannanto@pitt.edu>](mailto:pannanto@pitt.edu)
Date: Tue, Apr 27, 2021, 9:57 AM
Subject: RE: Telehealth Usability Questionnaire
To: Adelheid Fisher [<rittmey@mail-gvsu.edu>](mailto:rittmey@mail-gvsu.edu)

Apologies for not responding sooner. Yes you have the permission to use the Q. You might find this resource website useful:

[PITT Usability Questionnaire](#)

Bambang Pannanto, PhD
Professor and Chair
Department of Health Information Management
School of Health and Rehabilitation Sciences
University of Pittsburgh



Health Policy Brief

Telehealth Policy Analysis: Recommendations to Improve Medicaid

Reimbursement in Michigan

Adelle D.K. Fesner RN, BS/IT ritmevo@mail.qvsu.edu

Abstract: This paper was submitted to the Director of Michigan's Department of Health and Human Services. It provides a summary of the current state of telehealth reimbursement in Michigan and offers recommendations for improvement.

Background and Purpose

When the COVID-19 pandemic began in March 2020, Centers for Medicare & Medicaid Services enacted a temporary change to provide reimbursement for audio-only telehealth services. Telehealth is defined as the use of electronic information and communication technologies to support and promote long-distance health care, related education, public health, and administrative activities. Telehealth services include, but are not limited to, virtual visits, patient monitoring, and remote care; technologies that support telehealth include broadband and wireless communication (Health.gov, 2010). Prior to the pandemic, many definitions of telehealth excluded audio-only visits, and they were seldom reimbursed. Currently, the pandemic has increased the amount of reimbursement for telehealth services in clinical audio-only modalities in Michigan, but there is no plan to make these temporary policies permanent (MDHHS, 2011). As of June 2019, there were 2,385 million Medicaid beneficiaries in Michigan (Michigan Medicaid, 2020).

There are concerns that audio-only visits could result in fraud, abuse, and unnecessary, lower-quality care. Although these concerns are important to assess, eliminating audio-only visits could disproportionately affect underserved Medicaid beneficiaries. Furthermore, CMS signaled that temporary reimbursement for audio-only visits when the public health emergency ends (Fesner et al., 2021).

Michigan has approximately 12 million households that do not have permanent broadband and most of these households are located in rural regions (Michigan Economic Development Corporation, 2020). As such, Michigan has been presented with an opportunity to continue reimbursement for audio-only telehealth post-pandemic before the state has an opportunity to expand broadband coverage.



Key Findings

Prior to the pandemic, most states were not reimbursing for audio-only telehealth (CCHP, 2020). Currently, the pandemic has eased the availability of reimbursement for telehealth services during audio-only modalities. Post-pandemic, there is no plan to make these temporary policies permanent (MDHHS, 2020).

Methods

The study was a cross-sectional analysis of data from an ambulatory clinic in rural Michigan to identify how often this service was used and to understand

provide services for audio-only telehealth.

- Collected data on policies at the state level to understand the current state of audio-only telehealth in comparison to other states in the region.

Adult patients over the age of 18 who were seen at the ambulatory clinic via telehealth during the dates of 4/1/2020 - 5/21/2021 were included in the data collection. The number of patients at the ambulatory clinic that utilized telehealth services, by age, in synchronous and asynchronous, and e-visit, were collected, as a representative of the EHR. A survey was administered to providers at this site to understand provide services (performance of administrative care via audio-only telehealth and whether or not they were a benefit in continuing audio-only telehealth services after the pandemic).

Telehealth policies and bills were assessed from ten different states in the Upper Midwest and North Central Regional Telehealth Resource Centers. Measures that were collected included provider rates to add to daily reimbursement before during and after the pandemic. This data was collected to understand what states are planning to reimburse for audio-only telehealth post-pandemic. The methodology was to scope with key words "audio only" for each of the states. This data can be utilized to help urge Michigan to consider reimbursement for audio-only telehealth beyond the pandemic.



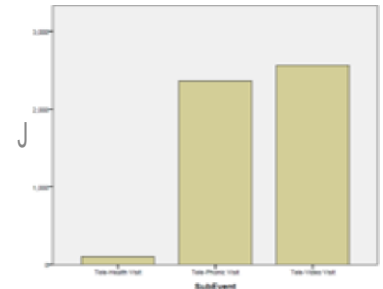
Figure 1: Upper Midwest and North Central Regional Telehealth Resource Centers (2020)

Results/Findings

- Telehealth care provided to a patient located at one of the ambulatory clinics in distant sites receiving care from the video from a provider at the hub site.
- Telehealth care provided to a patient located at home via audio-only mechanisms.
- Telehealth care provided to a patient located at home via audio-only mechanisms.

Telephonic visits were utilized almost 5,096 of the time; that means almost 2,400 patients who may not have otherwise received care had their care prevented potential complications. Patient population.

During the data collection period, there were just over 5,000 telehealth visits conducted with nearly half of these visits being telephonic. For all telehealth visits, 64% of patients were 65 and older. Inpatient telehealth visits, 73% were 65 and older. As such, there is a greater need for this modality in the 65+ population. This is just one example of the State of Michigan with data collected over a long period. Maintaining reimbursement for audio-only telehealth services is a huge opportunity for Michigan based on this data.



Health Policy Brief

The professional survey was based on a published telephone usability questionnaires examining the concepts of usefulness, ease of use and readability, internet accessibility, and satisfaction in a future release (Et al., 2016). Approval to use an adaptation of this questionnaire was obtained from the primary author. The qualitative data collected reflects the experiences of six providers at the ambulatory clinic. The demographics identified with regard to bariatric treatment would limit a longitudinal telephone use study:

- A lack of reimbursement limit in a facility prevents a comprehensive physical exam. Potential technology mitigation.

- Some additional themes identified from comments given by providers include:
- Auditory feedback is useful for certain scenarios.
 - Approval to use an adaptation of this questionnaire was obtained from the primary author.

One primary concern that was identified during the telephone survey was the use of certain visits such as nursing assessment and education when the provider is not present in person for the patient. Survivorship care includes issues related to follow-up care, late onset effects of treatment, improvement of quality of life, and psychological and emotional health.

All ten state policies were evaluated with all having a longitudinal health plan. Policies proposed to their state legislatures to be implemented by the COVID-19 pandemic except for the State of Michigan (see Table 1). Because of the varying degrees of implementation with regard to their state and definition of telehealth, it was difficult to be completely accurate with these results. This data is accurate as of 1/15/2021. The availability of 3-year degrees of care that is planned to be covered with most proposals that are provided via audio-only telephone health

coverage. Providers need to be reminded that the same person care. Two themes were identified in the analysis with regards to the type of care: telehealth is planned to be covered after the pandemic in each state.

- Alabama: health care defined in statute. Nebraska and Wisconsin.
- Colorado: professional code of ethics. Provider code of ethics. Same as in-person care: North Dakota, Michigan, Iowa, Illinois, Indiana, Ohio.
- South Dakota: has not indicated yet. (Washington) care would be covered post-pandemic. Each state is in a different stage of a process with the legislature.

Plan for continuation of Reimbursement	State	Y"/5/No/Proposed	¼ that type of rare is reimbursed	Bi U #
Great Plains Telehealth Resource and Assessment Center	North Dakota	Proposed	All care, provided it can be performed the same as in-person care	ND1465
	South Dakota	Proposed	Nat defined, set	S DS B.96
Nebraska Health	Proposed	Indiana	Individual health services	NE LB400
Minnesota	Proposed	All care, provided it can be performed the same as in-person care	MN HF14.11.2	
Iowa	Proposed	All care, provided it can be performed the same as in-person care	IA HF4.311	
Wisconsin	Proposed		WI SM-06	
Upper Midwest Health Resource Center				
Illinois	Proposed	All care, provided it can be performed the same as in-person care	IL HB3759	
Michigan	NA	NA	NA	
Indian	Proposed	All care, provided it can be performed the same as in-person care	IN HB 25	
Ohio	Proposed	All care, provided it can be performed the same as in-person care	OH HB 122	

Discussion

The qualitative data collected from the survey shows a promising feedback with regard to the providers' willingness to utilize audio-only telephone after the pandemic. Respondents to agreed that audio-only telephone should not replace in-person visits. An audio-only non-physical healthcare provider should be a rough audio-only telephone same as in-person. It will have been provided in person. The results from the EHR audit, were also beneficial in understanding how often each type of telephone was utilized. This data highlights the fact that audio-only telephone has been utilized most 5.056 of the time through out the pandemic at this ambulatory clinic.

Rnaw based on the state policy analysis is clear that most states are planning to implement for all care. Provider identification of the same as in-person care. As a result, the recommendation is for the State of Michigan to continue providing reimbursement. IPOS-pandemic to medical beneficiaries for a audio-only telephone did it can be performed the same as in-person care.

Call to Action

We are at a critical point in telehealth history where a policy window is open. It is important to push forward policy to support telehealth. It is important to support telehealth as a priority for the State of Michigan to move forward to align with the vision of delivering health and opportunity to all Michiganders, including emergency and health in equity by supporting reimbursement for audio-visual telehealth (MDHHS, 2020).

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