

COVID-19 TELEHEALTH STARTUP CHECKLIST:

- ☐ Contact your existing EHR vendor to assess functionality for telehealth that allows both audio and video communication.
- ☐ During the COVID-19 emergency, technologies such as FaceTime and Skype can be utilized. It is highly encouraged (but not required) that you notify your patients of potential security risks involved with these applications. Any apps that are public facing such as Facebook are not allowed.
 - ☐ The [Office for Civil Rights \(OCR\)](#) at the Department of Health & Human Services (HHS) will exercise its enforcement discretion and will not impose penalties for noncompliance with the regulatory requirements under the HIPAA Rules against covered healthcare providers in connection with the good faith provision of telehealth during the COVID-19 nationwide public health emergency.
- ☐ Review the telehealth vendors in your area or determine if the functionality within your EHR is a viable long-term solution, as this will be necessary if you plan to see patients via telehealth after the COVID-19 emergency is over. (See below for considerations on choosing a vendor.)
- ☐ It is recommended to enter into a Business Associate Agreement (BAA) with any vendors that are utilized for telehealth during the crisis, but especially for any long-term vendor selection.
- ☐ Ensure system's HIPAA compliance via use of secured encrypted transmissions for PHI beyond the current temporary COVID-19 OCR guidance exception.
- ☐ Complete an analysis of the projected revenue impact.
- ☐ Complete a data infrastructure analysis and consider a cellular hotspot backup solution.
- ☐ Review additional requirements for ICU or hospital telehealth solutions.
- ☐ Verify the patient's telehealth coverage based on their insurer (commercial vs. federal).
- ☐ Verify you are complying with the state laws for your location regarding informed consent (written versus verbal).
- ☐ Follow all the recommended COVID-19 CPT, ICD-10 and modifier guidelines for billing the telehealth visits (Information available in the [MGMA COVID-19 Coding Cheatsheet](#)).
- ☐ Verify Medicaid billing/reimbursement rules for your state(s).

- ☐ Research licensure rules for your state (if there is no reciprocity, providers may require medical licenses in multiple states to offer services outside of your home state).
- ☐ Establish a physician champion to be a resource for all your clinicians.
- ☐ Train and educate your staff and providers, including how to maintain eye contact and dress appropriately for good "webside" manner.
- ☐ Review malpractice considerations with your malpractice insurance carrier.
- ☐ Advertise/market the telehealth services.

CONSIDERATIONS FOR CHOOSING A LONG-TERM TELEHEALTH VENDOR:

- ☐ Customer reviews (providers and patients)
- ☐ System compliance with HIPAA and medical boards
- ☐ Type of services provided (e.g., live video visits, mobile friendly, phone, chat, secure messaging)
- ☐ 24/7 service and tech support
- ☐ Integration with current EHR
- ☐ Integration with current practice management system
- ☐ Implementation process
- ☐ Training provided
- ☐ Customizable solutions
- ☐ Marketing support from vendor
- ☐ Provider eligibility requirements (using providers from the practice or using providers from the vendor network)
- ☐ Real-time eligibility
- ☐ Support for insurance claims
- ☐ Integrated telehealth kiosk/carts
- ☐ Cost

ADDITIONAL RESOURCES

- [MGMA COVID-19 Action Center](#)
- [MGMA COVID-19 Resource Center](#)