

School-Based Telehealth Workgroup

INFORMATION GATHERING TABLES

Draft Version 4.0

The Maryland Health Care Commission (MHCC) appreciates the contribution made by members of the School-Based Telehealth Workgroup (workgroup). The MHCC is in the *information gathering stage* and seeks workgroup member input to complete the tables on the topic categories below. This information will be used to guide future deliberations by the workgroup. We anticipate completing the tables over multiple meetings with the diverse perspectives of workgroup members.

The items are organized by key categories based on discussions with the workgroup. This document is for information gathering purposes only and should not be considered a comprehensive list of all topic categories of discussion. Certain bullet points identified in the grids are supported by literature while others are aspirational or anecdotal. Those that are literature-based are marked with an asterisk; reference used for these items are included at the end of this document.

Instructions

The top row of each table identifies a topic/concept of discussion. Each table includes three quadrants: benefits, barriers/challenges, and solutions. Each quadrant is subdivided to include persons or entities (e.g., students, MSDE, schools or school districts, grant funds, private payors) that have a role in or may be impacted by the topic/concept of discussion. Other persons and entities may be added by the workgroup during discussions. We ask that workgroup participants list possible benefits, barriers/challenges, and solutions related to the topic/concept. Workgroup participants are not required to complete each quadrant for each table; we ask that participants identify benefits, barriers/challenges and solutions that are most relevant for them and are supported by literature, if possible. If the item is literature-based, please include an end note.

Definitions

Benefit: The value derived from producing or consuming a service

Barrier/Challenge: A circumstance or obstacle (e.g. economic, political, institutional, environment, social, etc.) that hinders or prevents progress, including a difficult task or complex situation that must be overcome in order to implement a solution

Solution: An idea aimed at solving a problem or managing a difficult or complex situation

Key Categories

- Service Delivery/Operations: Providing school-based telehealth¹ services² including implementation, compliance, management and maintenance

Table 1

Implementation of telehealth within schools	
BENEFITS <i>Students</i> <ul style="list-style-type: none"> • Increased access to services, particularly in areas with provider shortages • Decreased absenteeism* • Enhanced health literacy • Improved academic and health outcomes <i>Parents/guardians</i> <ul style="list-style-type: none"> • Expanded access to health and Individualized Education Plan (IEP)³ services for children • Ability for child to be treated at school, reducing time away from work • Reduced travel costs to school/provider • Health equity for caregivers who are unable to provide these services for their children <i>Schools or school districts</i> <ul style="list-style-type: none"> • Addresses provider shortages • Ability to better provide support to students with special needs (e.g., IEPs, behavioral health, chronic disease management, etc.) • Increased access to compensatory services or home/hospital services • Reduced student absenteeism 	BARRIERS & CHALLENGES <i>Students</i> <ul style="list-style-type: none"> • Concerns with potential disruption to the medical home • Confidentiality concerns* • Potential discomfort with seeing a new provider, especially in cases where parent is unable to join visit <i>Parents/guardians</i> <ul style="list-style-type: none"> • Parent desire for child to see their own primary/specialty care provider • Confidentiality concerns* • Addressing concerns around the treatment relationship with unknown telehealth providers • Lack of support or enthusiasm for the program* <i>Schools or school districts</i> <ul style="list-style-type: none"> • Beliefs that telehealth is not able to adequately support student needs* • Cost • Lack of staff support/buy-in • Ownership of the child's medical record (FERPA/HIPAA) • A telehealth-only model presents challenges when telehealth is not an appropriate modality for a significant need (i.e., reproductive health for secondary school, children)

¹ Telehealth means as it relates to the delivery of health care services, the use of interactive audio, video, or other telecommunications or electronic technology by a licensed health care provider to deliver a health care service within the scope of practice of the health care provider at a location other than the location of the patient. "Telehealth" does not include: (i) an audio-only telephone conversation between a health care provider and a patient; (ii) an electronic mail message between a health care provider and a patient; or (iii) a facsimile transmission between a health care provider and a patient.

² School-based telehealth services include those available to all students, students with IEP, within or outside of a SBHC, including but not limited to non-medical therapeutic services (e.g., mental health counseling, psychoeducational assessments, psychological consultations, etc.) and non-clinical services (e.g. occupational therapy, speech therapy, etc.).

³ The IEP is a written plan that describes the special education and related service support needed for a child with a disability. The IEP defines the type and amount of services needed and where the services will be delivered. School staff is responsible for the implementation of the IEP.

<p>SOLUTIONS</p> <p><i>Students</i></p> <ul style="list-style-type: none"> • Provide relevant clinical information to the child’s primary/specialty care provider regarding the telehealth encounter/intervention • Engage community-based primary/specialty care provider to deliver care via telehealth <p><i>Parents/guardians</i></p> <ul style="list-style-type: none"> • Build awareness around the potential value in using telehealth services • Connect the child to their primary/specialty care provider for a telehealth encounter <p><i>Schools or school districts</i></p> <ul style="list-style-type: none"> • Demonstrate the instances for which outcomes for telehealth services can be the same as via an in-person service • Develop an education ROI model that focuses on student impact of telehealth services • Create a learning community of providers, hospitals, FQHCs, local health departments, etc. to share best practices and best communication strategies • Grant funds to cover implementation costs, such as training, equipment purchases, upgrades to technical infrastructure, etc. 	3
<p>PARKING LOT</p> <ul style="list-style-type: none"> • Online therapies can also include evaluations, re-evaluations, and participation in IEP meetings • Impact to the larger community and the medical neighborhood • Industry supports that are available (i.e., ASHA) • Scope of provider practice (i.e., RN, NP, MD) 	

Table 2

Building awareness about the value of telehealth services	
<p>Benefits</p> <p>Students</p> <ul style="list-style-type: none"> • Opportunity to learn about an alternative service delivery method using technology <p>Parents/guardians</p> <ul style="list-style-type: none"> • Aware the services are available to start a conversation about their child receiving these services <p>Schools or school districts</p> <ul style="list-style-type: none"> • Opportunity to gain buy-in from school leadership to offer telehealth • Obtain information to advocate for bringing services provided via telehealth into the school 	<p>BarrierS & Challenges</p> <p>Students</p> <ul style="list-style-type: none"> • Caution from immigrant parents around talking to someone they don't know • Appropriately targeting awareness building for self-directive services • Potential stigma if technology is only used for IEP/mental health services • Messaging about which students are suitable for telehealth and types of services offered for these students <p>Parents/guardians</p> <ul style="list-style-type: none"> • Messaging about which students are suitable for telehealth and types of services offered for these students • Preconceived notions about telehealth services being inferior to in-person • Linguistic/cultural barriers <p>Schools or school districts</p> <ul style="list-style-type: none"> • Competing priorities of leadership and availability to hear about telehealth services • Identifying where/who/how/when the awareness building should be targeted • Appropriately developing awareness building strategies for all parents/guardians including language, culture, etc. • Remaining cognizant of equity issues across all students including translation issues • Access to parents and ability to get the message out to them • Messaging about costs
<p>SOLUTIONS</p> <p>Students</p> <ul style="list-style-type: none"> • Educate students about the process and benefits of telehealth services, including live demonstrations of the technology • Reassure students that telehealth is similar to seeing a provider in-person • Provide opportunities to try and test use of new technology • Target awareness building to students that are good candidates for telehealth <p>Parents/guardians</p> <ul style="list-style-type: none"> • Provide parents information about the benefits of using telehealth to connect their children to the services they need, including live demonstrations of the technology • An awareness building strategy that considers all parents and guardians <p>Schools or school districts</p> <ul style="list-style-type: none"> • Hands-on demonstration of the telehealth technology • Provide clear facts to leadership on current challenges and how telehealth services can address these challenges • Demonstrate the instances for which outcomes for telehealth services can be the same as an in-person service, including success stories from schools that have successfully implemented telehealth services 	

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- Option to offer culturally and linguistically appropriate services
- Methods to increase awareness to students could include:
 - Demonstrations and videos of exams to increase comfort level of students
 - Peer promotion from telemedicine users
 - Presentations to student groups
 - Focus groups for older students on how to best promote program to parents and other students
- Methods to increase awareness for parents could include:
 - Promoting the benefits through schools' email blasts
 - School principals promoting program in letter to parents, speaking about program at Back to School Nights, PTA meetings, and other parent events.
 - Including enrollment packets in school mailings and making it part of new student registrations
- Cost savings of not having a translator by accessing a service provider that is linguistically appropriate

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Table 3

Ensuring the continuum of care/care coordination via telehealth	
BENEFITS <i>Students</i> <ul style="list-style-type: none"> Increased coordination between students' primary/specialty care provider and school health care professionals Potential for increased medication adherence, monitoring, and education* <i>Parents/guardians</i> <ul style="list-style-type: none"> Decreased time away from work while maintaining continuum of care Increased communication between schools and service providers with parents/guardians to discuss care management and coordination* Potential for fewer visits/less duplicity <i>Primary care and specialty care providers</i> <ul style="list-style-type: none"> Improved ability to successfully treat patients due to increased* <i>Schools or school districts</i> <ul style="list-style-type: none"> Decreased absenteeism and enhanced overall health of students* Enhanced continuity of care and communication with school nurse* 	BARRIERS & CHALLENGES <i>Students</i> <ul style="list-style-type: none"> Consent and HIPAA/FERPA concerns* Inability to be seen by their own provider via telehealth Lapses in communication between school/remote providers and the child's primary/specialty care provider due to technology gaps (i.e., lack of EHR) <i>Parents/guardians</i> <ul style="list-style-type: none"> Child's primary/specialty care provider is not engaging in telehealth services Concerns around sharing child's information <i>Primary care and specialty care</i> <ul style="list-style-type: none"> Lack of buy-in or support from providers* Technical limitations of some community providers (e.g., insufficient internet access, lack of an EHR, etc.). Issue of the "doc-in-a-box"/continuity of care over time <i>Schools or school districts</i> <ul style="list-style-type: none"> Lack of buy-in or support from school staff* HIPAA/FERPA requirements and obtaining consent to share information*
SOLUTIONS <i>Students</i> <ul style="list-style-type: none"> Strive to coordinate with local providers Obtain parental consent to contact the child's primary/specialty provider Ensure streamlined workflow for information sharing, particularly for providers who lack certain technical capabilities (e.g., EHR) Combination of in-person and telehealth services <i>Parents/guardians</i> <ul style="list-style-type: none"> Inform parents of the benefits to sharing the child's information Inform parents of the confidentiality requirements and the methods used to protect child's information <i>Primary care and specialty care</i> <ul style="list-style-type: none"> Engage the community and secure community support using community wide-meetings and personal visits to crucial stakeholders* Ensure that the telehealth program is filling a health care gap and not duplicating services* <i>Schools or school districts</i> <ul style="list-style-type: none"> Ensure that the telehealth program is filling a health care gap and not duplicating services* Use the beginning of the year/enrollment as a time to obtain consent* Engage community providers to deliver telehealth services Develop a process to engage and/or communicate relevant information to the child's primary/specialty care provider Combination of in-person and telehealth services Establish partnerships with the FQHCs to align on similar goals/continuity of care 	
Parking Lot <ul style="list-style-type: none"> Continuity of care from a SHS to the child's medical home doesn't exist currently absent telehealth 	

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Table 4

Technology (i.e., hardware and software) used in a telehealth encounter	
BENEFITS <i>Schools and Providers</i> <ul style="list-style-type: none"> Increased access to providers to deliver necessary services, while providing quality care* <i>Students</i> <ul style="list-style-type: none"> Technology could be viewed as “cool” <i>Parents/guardians</i> <ul style="list-style-type: none"> Opportunity for increased involvement of parents/guardians in services provided at school through virtual participation (e.g., three-way conferencing) 	BARRIERS & CHALLENGES <i>Schools and Providers</i> <ul style="list-style-type: none"> Access to broadband connectivity, particularly in rural areas* Access to technicians to address problems with equipment* Training of providers and staff both at the school and at the distant site* Level of comfort with the technology* Limited space for telehealth equipment that is both private and secure Ownership over the technology processes <i>Students</i> <ul style="list-style-type: none"> Ability to use technology and the potential need for significant oversight/supervision <i>Parents/guardians</i> <ul style="list-style-type: none"> Level of comfort with the technology*
SOLUTIONS <i>Schools and providers</i> <ul style="list-style-type: none"> Hands-on training and demonstrations, including tutorials and practice drills* Provide continual technical support* Research partnerships with local universities, hospitals, health care systems, or telehealth vendors for implementing and maintaining technology* Use mobile hotspots to increase connectivity Interoperability to help with continuity of care <i>Students</i> <ul style="list-style-type: none"> Utilize user experience design when developing a solution to support telemedicine* <i>Parents/guardians</i> <ul style="list-style-type: none"> Demonstrations of the technology 	
PARKING LOT <ul style="list-style-type: none"> 	

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Table 5

Management and administration of people, processes, and procedures to deliver telehealth services	
BENEFITS <i>State regulation</i> <ul style="list-style-type: none"> Develop program standards for staffing qualifications, training, etc. Develop standards for telehealth technologies and treatment protocols Ability to provide oversight of telehealth services to ensure quality and confidentiality standards are met <i>Schools or school district</i> <ul style="list-style-type: none"> Control resource allocation and distribution across the school district according to measured or perceived needs for telehealth Oversight of individuals delivering telehealth services with standardized protocols <i>Third Party Payers/Medicaid</i> <ul style="list-style-type: none"> Ability to require certain standards be met in order for schools to be reimbursed for telehealth services 	BARRIERS & CHALLENGES <i>State regulation</i> <ul style="list-style-type: none"> “One-size fits all” regulations may not be appropriate solutions for diverse schools and districts Limitations imposed by licensing boards on telehealth service providers <i>Schools or school districts</i> <ul style="list-style-type: none"> Schools with limited resources may have staffing challenges to be able to manage telehealth services Difficulty hiring providers Contract management Authority over telehealth service providers who may not be employed by the school <i>Third Party Payers/Medicaid</i> <ul style="list-style-type: none"> Time to develop and implement new processes for reimbursement of telehealth services
SOLUTIONS <i>State regulation</i> <ul style="list-style-type: none"> Flexibility in development and periodic reevaluations of regulations Incorporation of stakeholders in rules development Provide flexibility to schools/school districts to manage the delivery of telehealth services <i>Schools or school districts</i> <ul style="list-style-type: none"> Dedicate funds for telehealth at the district-level to facilitate staff hiring Ensure contracts have clear language around authority governing telehealth services providers (i.e., school vs telehealth service company/health care organization) Establish innovative care delivery models incorporating telehealth with hands-on care <i>Third Party Payers/Medicaid</i> <ul style="list-style-type: none"> Modify Medicaid regulations/policies Expand reimbursement from non-government payers for telehealth services 	
PARKING LOT <ul style="list-style-type: none"> Legislative involvement – Specify authority to regulate Cost and quality of care among the various staffing solutions to determine the most efficient resource allocation 	

Table 6

Existing telehealth compliance requirements, including SBHC application process, standards, and reporting	
BENEFITS MSDE/MDH <ul style="list-style-type: none"> Consistent process for monitoring, reporting, and evaluating quality standards Ability to model the established process to other areas of the school (i.e., SHS) Authority to provide professional development and technical assistance to schools seeking to implement telehealth Schools or school districts <ul style="list-style-type: none"> Established framework for financing Protection for the provider and child Benefits the students who have special needs (both medical and special ed) Expansion of services to areas experiencing shortages of qualified providers 	BARRIERS & CHALLENGES MSDE/MDH <ul style="list-style-type: none"> No law governs the SBHC, only policies No policies around using telehealth in SHS Policies around mental health services are not clear Separating telehealth as a care delivery modality from the care delivery within a SBHC Schools or school districts <ul style="list-style-type: none"> Technical and administrative infrastructure to meet telehealth requirements Time of the process to set up a SBHC regardless of telehealth Cost to set up a full SBHC SBHC requirement to have a provider on site Availability of school nurses to use telehealth Lack of policies for emergencies that may arise when a school nurse is utilizing telehealth Staffing resources and consideration of the burden on providers and school nurses
SOLUTIONS MSDE/MDH <ul style="list-style-type: none"> Develop policy for implementing telehealth in SHS that allows for innovation while protecting students and quality of care Look to other states for existing models that use telehealth in schools Identify core competencies needed for setting up telehealth programs Schools or school districts <ul style="list-style-type: none"> Add to/streamline policies for telehealth programs Have telehealth in the SHS policy 	
PARKING LOT <ul style="list-style-type: none"> Schools may not be seeking the originating site fee from Medicaid Lack of definition for what constitutes adequate health services, which schools are required to provide by statute Meeting with MDH and MSDE to discuss telehealth policies outside SBHCs to support new solutions is in the works 	

Table 7

<i>Establishing adequate funding sources to implement telehealth and establishing a sustainable telehealth program</i>	
BENEFITS <ul style="list-style-type: none"> • Cost savings for having only an RN vs. MD, NP etc. • Use with certain sub-specialties where a funding model exists • Expanded capacity for certain specialties for consultations to augment services on site 	BARRIERS & CHALLENGES <ul style="list-style-type: none"> • Potentially not a good ROI for all services in the SHS • Must have a high volume of visits to off-set the up front costs • Anti-kick back laws that limit providers/practices from reimbursing school for delivering care via telehealth • Using telehealth for IEP services does not result in a cost saving benefit for using remote providers
SOLUTIONS <ul style="list-style-type: none"> • Explore partnerships within the community to absorb costs (.e.g, Howard County has a model in which they have a partnership with hospitals and are not paying for the providers) • Reimbursement mechanism for a provider to reimburse the schools • Develop a telehealth cost sharing model (ACO-like) • Funding mechanism for telehealth for IEP services 	
PARKING LOT <ul style="list-style-type: none"> • Project ECHO – dealt with issues regarding linking to the community and funding which occurred through grants • University of Rochester model – mobile telepresenter model funded through agreement with MCOs • 	

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Table 8

Existing Medicaid and private payor telehealth reimbursement models	
BENEFITS COMMERCIAL <ul style="list-style-type: none"> Private payors reimburse for any services that rendered that would be covered in person (SBHCs included) MEDICAID <ul style="list-style-type: none"> Medicaid reimburse for services within a SBHC 	BARRIERS & CHALLENGES COMMERCIAL <ul style="list-style-type: none"> In network vs. out of network providers Getting the in-network status for some private payors can be prohibitive MEDICAID <ul style="list-style-type: none"> Originating site vs. distant site (i.e., SBHCs are only approved school site and must have a Medicaid ID to bill) <ul style="list-style-type: none"> Providers must register and be approved as telehealth providers to bill Reimbursement issues regarding the place of the student (e.g. students at home) No policies for school nurses to bill for Q-codes for services via telehealth IEP services are not reimbursed
SOLUTIONS COMMERCIAL <ul style="list-style-type: none"> Work to get more schools as in-network providers MEDICAID <ul style="list-style-type: none"> Allow for IEP services to be reimbursed when rendered through telehealth Allow for other types of sites (i.e., SHS) to be reimbursed Allow for other provider types (i.e., RNs) to be eligible for reimbursement 	
PARKING LOT <ul style="list-style-type: none"> Carriers are enrolling SBHCs in-network regardless of telehealth CareFirst has enrolled SBHCs Medical home models Change of policies for Medicaid to add schools/RNs etc would be a heavy lift Data to articulate the cost savings 	

LITERATURE

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