

CMS Develops a Telehealth and mHealth Toolkit for Medicaid and CHIP Coverage During COVID-19 Pandemic

Among the nearly daily guidance updates and rapid-fire emergency orders, federal agencies have been releasing in response to the COVID-19 pandemic is now a 24-page toolkit developed by CMS to expand telehealth and mHealth adoption.

Released on April 23, 2020, under Medicaid and the Children's Health Insurance Program (CHIP), the Policy Considerations for States Expanding Use of Telehealth (COVID-19 Version) toolkit is intended to "identify for states the policy topics that should be addressed in order to facilitate widespread adoption of telehealth services, especially when they reside outside the immediate authority of a Medicaid or CHIP program."

While many states have been utilizing telehealth services for decades, the pandemic has fast-tracked the need for providing such services on a national scale. Given the pace at which telehealth has grown as well as the complex and interrelated nature of the state-level regulatory framework, CMS's toolkit provides guidance on what steps to take to ensure that a regulatory barrier to telehealth services in one area does not block the regulatory alignment of others.

In particular, the toolkit narrows down telehealth into a "complex mix" of the following interrelated categories:

- Patient populations eligible for telehealth;
- Coverage and reimbursement policies;
- Providers and practitioners eligible to provide telehealth;
- Technology requirements; and
- Pediatric considerations.

In addition to answering FAQs concerning coding guidance as well as benefit, financing, workforce, managed care, and health information exchange flexibilities, the toolkit includes a detailed checklist of policy questions "intended to serve as a tool for states to assess telehealth in their state."

The same day the toolkit was unveiled, CMS Administrator Seema Verma also reached out to states to encourage health officials to broaden the use of telehealth in Medicaid and CHIP stating, "While not all patient interactions can be delivered through telehealth, our clinicians on the frontlines need every tool in their arsenal to fight this invisible enemy. I'm urging states to use this toolkit to make sure our Medicaid patients, particularly our children, can continue to receive needed care from the safety of their homes."

Nelson Hardiman will continue to keep you updated regarding guidance and orders from CMS and other federal agencies in response to the pandemic. Up-to-the-minute announcements from CMS in the form of press releases are also available at [CMS's Newsroom](#).

For more COVID-19 related legal updates, please consider [subscribing to our COVID-19 Task Force Newsletter](#).

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