



For Public Comment
November 18, 2020–January 13, 2021
Comments due 11:59pm ET
January 13, 2021

Patient-Centered Medical Home & Patient-Centered Specialty Practice Telehealth Distinction

Overview

Note: *This publication is protected by U.S. and international copyright laws. You may reproduce this document for the sole purpose of facilitating public comment.*

©2020 by the National Committee for Quality Assurance
1100 13th Street NW, 3rd Floor
Washington, DC 20005

All rights reserved. Printed in U.S.A.
NCQA Customer Support: 888-275-7585
www.ncqa.org

Overview

Our Mission: Improve the Quality of Health Care

NCQA is dedicated to improving health care quality.

For 30 years, NCQA has been driving improvement throughout the health care system, helping to advance the issue of health care quality to the top of the national agenda. NCQA's programs and services reflect a straightforward formula for improvement: measurement, transparency, accountability.

This approach works, as evidenced by the dramatic improvements in clinical quality demonstrated by NCQA-Recognized primary care and specialty practices using both standards and performance results. Today, approximately 130 million Americans are seen by an NCQA-Recognized practice. NCQA is dedicated to improving health care quality.

Background and Objectives

NCQA's Recognition Programs for Patient-Centered Medical Home (PCMH), released in 2008, and Patient-Centered Specialty Practice (PCSP), released in 2013, were created to recognize primary care and specialty practices that focus on improved communication and coordination in the medical neighborhood.

In addition to Recognition, NCQA offers special acknowledgment for practices that excel in specific areas through Distinctions such as behavioral health integration, which signify to the public and others that practices go above and beyond the standards of the medical home or specialty practice by demonstrating their additional commitment to the Distinction's focus area.

NCQA is [working to integrate telehealth](#) with other care modalities to enhance provider-patient relationships and improve quality. Our goal is to maximize the benefits of telehealth services while supporting a high standard of care across the healthcare system. NCQA has adapted [40 HEDIS measures](#) to allow greater use of telehealth and updated the guidance of the [PCMH](#) and [PCSP](#) Standards and Guidelines to highlight how the criteria can be met through telehealth. In addition, NCQA, along with the Alliance for Connected Care and the American Telemedicine Association, convened a [Taskforce on Telehealth Policy](#) to develop recommendations for telehealth reimbursement and standards for ensuring high-quality, safe and accessible care while maintaining program integrity.

As part of NCQA's efforts to integrate telehealth into other care modalities, NCQA proposes a Telehealth Distinction as an addition to PCMH/PCSP Recognition programs. This Distinction will help practices/clinicians show that they have successfully integrated telehealth that is patient-centered, focused on quality and appropriate, and will enhance the value of NCQA Recognition by:

- Establishing an industry standard.
- Focusing on requirements with the greatest impact on desired outcomes.
- Ensuring clinical delivery and patient access of high-quality, safe and appropriate telehealth services.
- Assessing clinical data and processes to support quality improvement and accountability.
- Responding to payer, employer, federal, state and regional needs and priorities to differentiate practices and to effectively influence value-based contracting and payment.

Find information on the PCMH/PCSP Recognition programs at: <https://www.ncqa.org/programs/health-care-providers-practices/patient-centered-medical-home-pcmh/>

Guiding Principles

As we developed the program content, we identified guiding principles to focus our efforts:

1. Practices/clinicians and payers are accountable for coordinated, effective care that is delivered through telehealth.
2. Practices/clinicians offering telehealth are responsible for ensuring that telehealth services are of high quality.
3. Practices/clinicians have private and secure systems.
4. Practices/clinicians offer clinically appropriate services to ensure safe delivery of care via telehealth.

Structure of Requirements

NCQA asks respondents to consider whether the requirements are feasible as written and are clearly articulated, and to highlight areas that might need clarification.

Telehealth Distinction follows the “core” and “elective” structure of PCMH/PCSP. NCQA seeks input from stakeholders on these requirements. Recommendations are organized across seven competency sections; criteria are sorted into two groups:

- **CORE CRITERIA:** A practice must meet these to earn Telehealth Distinction.
- **ELECTIVE CRITERIA:** Practices can tailor criteria to the community and populations they serve.

Practices may demonstrate they meet some requirements through a virtual review during the Recognition process.

Distinction Competencies

NCQA Prerequisite	The practice has achieved or is concurrently applying for PCMH/PCSP Recognition. The practice must achieve Recognition to receive Distinction.
Appropriateness of Care	The practice assesses whether the type of care needed can be appropriately delivered through telehealth or should be addressed in another setting.
Care Coordination	The practice conducts care management appointments or integrates behavioral health using telehealth.
Telehealth Capabilities	The practice has the appropriate technology to deliver care through telehealth.
Workforce Training and Communication	The practice establishes telehealth workflows and informs patients about using telehealth to receive care.
Access & Equity	The practice monitors adequacy of access to telehealth appointments and ensures that clinical advice provided is reconciled with the medical record.
Use of Evidence-Based Care	The practice uses evidence-based guidelines to conduct telehealth visits.

Quality Improvement

The practice measures and evaluates its performance against goals or benchmarks to monitor the quality of care delivered using telehealth. Inclusive of patient and provider experience.

Stakeholders Participating in Public Comment

Public comment is integral to the development of NCQA standards and measures. NCQA actively seeks input from all interested parties during the development process and integrates recommendations in the final version of its programs.

Public Comment Instructions

Refer to [Appendix 6: Proposed PCMH/PCSP Telehealth Distinction Requirements](#) for a full list of proposed requirements.

Public Comment Questions

Public comment is integral to the development of all NCQA standards and measures. NCQA considers all suggestions. Many comments lead to changes in our standards and policies. The public comment review process makes our standards stronger and more worthwhile for all stakeholders.

Feedback on Global Issues

NCQA requests reader thoughts and insights on global issues related to product updates.

- Is the scope of requirements reasonable and consistent with a primary care or specialty practice telehealth workflow?
- Does your practice have the necessary systems and materials (e.g., documents) to meet the criteria? If not, which criteria are most challenging to meet? Which are most challenging to document?
- Only primary care and specialty practices that have earned either NCQA PCMH or PCSP Recognition are eligible to receive this Distinction. Should this Distinction be open to non-NCQA Recognized practices? If yes, which core criteria of the PCMH/PCSP programs should be included in the program?

Feedback on Criteria

NCQA requests general feedback on the proposed criteria and criteria groups. When you determine your level of support for each category, consider:

- Are criteria clearly articulated? If not, which areas need clarification?
- Do criteria align with practice services and stakeholder expectations? Are there requirements that do not apply? Be specific.
- Should NCQA consider other criteria or changes to recommended criteria?

Targeted Questions

- *Appropriateness of Care*
 - Are there established guidelines for triaging patients who request telehealth appointments and for assessing whether telehealth is the appropriate modality of care?
- *Telehealth Capabilities*
 - Are there capabilities that were not included in this competency, but should be?
- *Workforce Training & Communication*
 - Does your practice help patients determine if services are covered by insurance when delivered using telehealth?
- *Access & Equity*
 - When assessing and addressing access barriers for vulnerable patients, are there other resources or interventions that should be added to the list?

- *Use of Evidence-Based Care*
 - Does your practice follow telehealth-specific evidence-based guidelines or clinical decision supports when treating conditions through telehealth?
- *Quality Improvement*
 - Does your practice report telehealth-specific measures for clinical quality, care coordination and/or health care costs?
 - Does your practice track quality measures for telehealth visits separately from in-person visits?
- *Patient Experience*
 - As telehealth advances health care's move into the digital age, what are the best approaches for using digital tools to improve patient experience?

Submitting Comments

Respond to topic and element-specific questions for each product on NCQA's public comment website. NCQA does not accept comments by mail, email or fax.

1. Go to <http://my.ncqa.org> and enter your email address and password.
2. Once logged in, scroll down and click **Public Comments**.
3. Click **Add Comment** to open the comment box.
4. Select the following product from the drop-down box:
 - a. **PCMH & PCSP Telehealth Distinction**.
5. Click to select the **Topic** and **Element** (question) on which you would like to comment.
6. Click to select your support option (**Support, Do not support, Support with modifications**).
 - a. If you choose **Do not support**, include your rationale in the text box.
 - b. If you choose **Support with modifications**, enter the suggested modification in the text box.
7. Enter your comments in the **Comments** box.

Note: *There is a 2,500-character limit for each comment. We suggest you develop your comments in Word to check your character limit; use the "cut and paste" function to copy your comment into the Comments box.*
8. Use the **Submit** button to submit more than one comment. Use the **Close** button to finish leaving comments; you can view all submitted comments in the **Public Comments** module.

All comments must be entered by Wednesday, January 13, at 11:59 p.m. ET

Next Steps

All suggestions will be considered. The final PCMH/PCSP Telehealth Distinction program standards will be released in spring 2021, following approval by the NCQA Clinical Programs Committee and the NCQA Board of Directors.