

Hospice and Palliative Care Resources for the Coronavirus Disease (COVID-19)



NHPCO COVID-19 Update – 04/06/20

NHPCO has created this update for hospice and palliative care providers to share recent news and helpful links.

“You are there for your community. NHPCO is there for you.”

Policy Updates

Clarifying CMS Language on the Use of Telephones for Telehealth: Telehealth Technology Requirements

On March 31, 2020, the CMS National Stakeholder call added confusion about what types of equipment would be allowed for telehealth services by stating that phones would be allowed. In the NHPCO webinar that followed that stakeholder call, NHPCO erroneously reported that phone calls (audio only) would be allowed.

In short, the use of audio-only telephones **does not meet the CMS requirement for interactive telecommunications systems**. Any device used for telehealth services, **MUST HAVE BOTH AUDIO AND VIDEO REAL-TIME INTERACTIVE CAPABILITIES**. The [Interim Final Rule with Comment \(IFC\)](#) clarifies what technology is allowed as follows (bold added):

*Our regulation at § 410.78(a)(3) states that **telephones, facsimile machines, and electronic mail systems do not meet the definition of an interactive telecommunications systems for purposes of Medicare telehealth services**. As we interpret it, this regulation does not apply to mobile computing devices that include audio and video real-time interactive capabilities, even though such devices are now referred to colloquially as “phones” since they can also be used for audio-only telecommunications. In light of the PHE for the COVID-19 pandemic, we believe it is important to avoid the potential perception that this language might prohibit use of any device that could otherwise meet the interactive requirements for Medicare telehealth, especially given that leveraging use of such readily available technology may be of critical importance.*

*Therefore, we are revising § 410.78(a)(3) to add an exception to this language on an interim basis for the duration of the PHE for the COVID-19 pandemic. We are adding the following language at § 410.78(a)(3)(i): “Exception. For the duration of the public health emergency as defined in § 400.200 of this chapter, **Interactive telecommunications system means multimedia communications equipment that includes, at a minimum, audio and video equipment permitting two-way, real-time interactive communication between the patient and distant site physician or practitioner.**”*

Provider Updates

New Video Available on Medicare Coverage and Payment of Virtual Services

CMS released a [video providing answers to common questions](#) about the Medicare telehealth services benefit. CMS is expanding this benefit on a temporary and emergency basis under the 1135 waiver authority and Coronavirus Preparedness and Response Supplemental Appropriations Act.

COVID-19 Ethics Toolkit Available Now

NHPCO has developed a [COVID-19 Ethics Toolkit](#). The kit includes an ethical framework written by Carla Cheatham; information from a booklet on ethical considerations during a pandemic; our Shared Decision-Making tool; and discussion, symptom management, and comfort care tools from Dr. Mimi Pattison at CHI Franciscan. This toolkit can help you anticipate difficult decisions, provide information and support to seriously ill individuals and their families, and connect seriously ill individuals to resources aligned with their goals of care. NHPCO believes community-based services are a critical partner in responding to the COVID-19 pandemic. Special thanks to our Ethics Advisory Council members for sharing their expertise.

COVID-19 Webinar Exclusively for NHPCO Members

On Wednesday, April 8, 2020, from 2:00 – 3:00 p.m. ET, NHPCO will offer a free webinar for members only, ***Demystifying Hospice Virtual Care in the COVID-19 Emergency: Virtual IDTs, Virtual Visits and Face to Face Visits for Recertification***. Taught by Chris Acevedo and Jean Acevedo of Acevedo Consulting, Inc. This webinar will provide authoritative information on the hospice face-to-face requirement and the ability to conduct it through telehealth and how to bill for a medically necessary visit that occurs during the face-to-face visit. Information will also be provided on what is allowed for routine home care virtual visits, the roles of the IDT, the updates to the plan of care noting virtual visits, and how to document. NHPCO members will find [more information and the necessary registration link online](#).

Resources

New Resources from the CDC

- [Use of Cloth Face Coverings to Help Slow the Spread of COVID-19](#) (4/4/20)
- [Cloth Face Coverings: Questions and Answers](#) (4/4/20)
- [CDC Launches New Weekly COVID-19 Surveillance Report](#) (4/4/20)

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