



Telehealth Policies and Federally Qualified Health Centers

FQHC FACT SHEET

Fall 2022

With support from the National Association of Community Health Centers (NACHC) through funding from the Health Resources and Services Administration (HRSA), the Fall 2022 Edition of the Center for Connected Health Policy's (CCHP) Telehealth summary report and Policy Finder tool have a new category for each state on federally qualified health centers' (FQHCs) telehealth Medicaid fee-for-service policy. As is the case for Medicaid telehealth policy in general, the manner in which state Medicaid programs address telehealth reimbursement for FQHCs, and therefore enable them to incorporate telehealth into their clinics, varies widely by state.

Methodology

- State Medicaid manuals, administrative codes, and manuals for fee-for-service policies were reviewed between July and early September 2022.
- CCHP only counts states as providing reimbursement if official and explicit Medicaid documentation was found confirming they are reimbursing FQHCs specifically for a certain modality. A broad statement that all providers are reimbursed or any originating site is eligible without an explicit reference to FQHCs was insufficient.
- COVID-19 emergency policies are not included in CCHP's reporting. Only permanent policies are accounted for.
- A state Medicaid program was counted as reimbursing FQHCs even if they do so in a very limited way, such as only for mental health.

Key Findings

Definition of Encounter/Visit & Same Day Encounters

The majority of Medicaid programs do provide a definition for a FQHC 'encounter' or 'visit' that stipulates that it is a face-to-face interaction. This does not necessarily preclude use of telehealth, as live video can also be considered 'face-to-face'. In fact, some Medicaid programs do specify in their definition of an encounter/visit that a telehealth would qualify as a visit.

EXAMPLE:

OREGON is a rare example of a state that defines an encounter as face-to-face, which includes a two-way audiovisual link, OR telephone contact under specific circumstances.

CALIFORNIA'S definition of a visit also includes audio-only synchronous interaction as well as asynchronous store-and-forward for certain FQHC providers.

Note that the cases of Oregon and California are rare, and most states limit their definitions to either to live video telehealth or don't explicitly reference telehealth modalities at all.

Fqhc Policy Procedure Manual

Scott C. Dulebohn



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