

MDS Alert

Reader Question: Telehealth Won't Replace Provider Visits

Question: My facility is in a rural region and we have a dearth of physicians or even nurse practitioners, which makes the regulations surrounding a required physician visit every 30 days especially tough. I've been following the Centers for Medicare and Medicaid's (CMS) focus on making telehealth more accessible across the board. Will telehealth become an option for residents?

Maryland Subscriber

Answer: Using telemedicine or other virtual contact for these visits is expressly forbidden and puts your facility at risk of an Ftag: F712.

Background: "In a SNF, the first physician visit (this includes the initial comprehensive visit) must be conducted within the first 30 days after admission, and then at 30-day intervals up until 90 days after the admission date. After the first 90 days, visits must be conducted at least once every 60 days thereafter," says the 2017 CMS State Operations Manual (SOM).

A resident "must be seen, for purposes of the visits required by §483.30(c)(1), [meaning] that the physician or NPP must make actual face-to-face contact with the resident, and at the same physical location, not via a telehealth arrangement," the SOM says.

If the resident is newly admitted, the initial timeline isn't so tight.

"There is no requirement for this type of contact at the time of admission, since the decision to admit an individual to a nursing facility (whether from a hospital or from the individual's own residence) generally involves physician contact during the period immediately preceding the admission," the SOM says.