Telehealth and State Health Workforce

What is telehealth?

[HRSA](#) defines telehealth to broadly include the use of electronic information and telecommunication technologies to support long-distance clinical health care, patient and professional health-related education, health administration, and public health. Telehealth has been around for decades, but the COVID-19 pandemic accelerated the expansion of telehealth as a means of delivering healthcare to Americans.

It is important to note that telehealth is a mechanism to support the delivery for healthcare services and is not a service itself. Healthcare professionals use telehealth to provide healthcare services for patients remotely. These services may be provided synchronously (professional and patient interacting in real-time) through virtual appointment, or asynchronously (professional and patient interact at separate times) using store and forward technologies. Regardless of the implementation approach, telehealth is dependent upon the availability of health professionals to provide healthcare services. Health professionals can deliver healthcare services across state lines, depending on the statutes and rules set by state policies.

States policies related to the healthcare workforce have an important role in telehealth.

Occupational Regulation

Licensing

- Healthcare professionals are required to hold a license or be authorized to practice in the states they practice in, including states that they provide healthcare services through telehealth.

- In some instances, states have separate telehealth certifications that are required in addition to licensure for professionals geographically located outside the state.
  - Example: Indiana has a Telehealth Provider Certification that is required by Indiana Code [25-1-9.5-9](#). This certification is to ensure that the practitioner and their employer voluntarily agree to be subject to the jurisdiction of Indiana courts and Indiana substantive and procedural laws concerning the care of an individual who is located in Indiana at the time of service. These certifications must be completed before the provider may establish a provider-patient relationship for an individual in Indiana.

Licensure Portability

- Telehealth enables healthcare professionals to provide services to patients located in different geographies. State policies regarding licensure portability (provisions related to a licensed individuals ability/authorizations to practice in other states/jurisdictions) may enable states to recruit qualified health professionals to provide telehealth services for their constituents (see State Policy Options to Support License Portability)

  - Licensure Reciprocity and Endorsement
  - Licensure Compacts
  - Universal License Recognition

Medicaid Policy

The specific healthcare professionals that are authorized to deliver and receive reimbursement for healthcare services provided for Medicaid enrollees is defined in each state's State Plan. The State Plan is developed by the State Medicaid agency and approved by the Centers for Medicare & Medicaid Services (CMS). Authorization is required for professionals that provide services through telehealth.

- Increasing the types of providers that are authorized to deliver services (generally through legislation) also requires a state to submit a State Plan Amendment to CMS in order for providers to be reimbursed for telehealth services. Increases in the types of authorized providers must be considered in relation to broader regulatory policies (scope of practice) to ensure alignment. For example, if a state desired to allow behavioral health counselors to be reimbursed through Medicaid for services provided via telehealth, a state would need to ensure this is supported by both Medicaid service policies (generally under the authority of state Medicaid agencies that would have authority to submit a plan amendment) and through professional practice policy alignment (generally through a state legislature or through authority given by Legislature to a behavioral health licensing board).

- The health of school-aged children is an important indicator of the health of a community. The delivery of health services at schools is a strategy to enhance access for children, especially those who face barriers to accessing health care services. States have opportunities to support access to health services for school aged children by developing policies for Medicaid to reimburse for school-based telehealth services. As of May 2021, 24 states had Medicaid reimbursement policy for School-Based Telehealth services.

  - Telehealth Reimbursement for School- Based Health Services

Additional Considerations

Broadband policies - Certain modalities associated with telehealth services require access to broadband internet. Such access can be especially challenging for rural communities. Governors have the opportunity to support telehealth services through policy initiatives which seek to expand broadband access. For more information see NGA commentary: [Governors Lead on Expanding Access to Affordable Broadband for Telehealth Services.](#)

Resources

- The federally sponsored National Telehealth Resource Center, the [Center for Connected Health Policy (CCHP)](#), provides support to regional [Telehealth Resource Centers](#) located across the United States. Regional TRCs provide support directly to states on telehealth related issues.
- [Telehealth.HHS.gov](#) is a publicly available website containing information and resources for patients and providers.
- The Centers for Medicare & Medicaid Services (CMS) developed a [Medicaid & CHIP Telehealth toolkit](#) as a resource for states considering the adoption of broader telehealth coverage policies.
- The National Academy for State Health Policy created a dashboard which tracks states' use of American Rescue Plan Act funding to support telehealth activities: https://www.nashp.org/how-states-use-arpa-funds-to-support-telehealth-technology-and-data-infrastructure/