

CRITICAL ACCESS HOSPITALS

TELEMEDICINE

***Should be used in conjunction with CAH Agreements Checklist**

| Self-Assessment Questions | YES | NO | N/A | Date/Initials | Comments |
|---|--|--|--|---------------|----------|
| <p>If the CAH uses a distant site hospital for telemedicine services, does the CAH's governing body ensure the telemedicine agreement is written and specifies that it is the responsibility of the governing body of the distant-site hospital to</p> <ul style="list-style-type: none"> a. determine, in accordance with State law, which categories of practitioners are eligible candidates for appointment to the medical staff b. appoint members of the medical staff after considering the recommendations of the existing members of the medical staff c. assure that the medical staff has bylaws d. approve medical staff bylaws and other medical staff rules and regulations e. ensure that the medical staff is accountable to the governing body for the quality of care provided to patients f. ensure the criteria for selection are individual character, competence, training, experience, and judgment g. ensure that under no circumstances is the accordance of staff membership or professional privileges in the hospital dependent solely upon certification, fellowship or membership in a specialty body or society. <p>C-0872 §485.616(c)(1)(2)</p> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> | | |
| <p>If the CAH's governing body chooses to rely upon the credentialing and privileging decisions made by the governing body of the distant-site hospital does the CAH's governing body, through the written agreement, ensure</p> <ul style="list-style-type: none"> a. the distant-site hospital providing telemedicine services is a Medicare-participating hospital b. the individual distant-site physician or practitioner is privileged at the distant-site hospital providing the telemedicine services. c. does the distant site hospital must provide a current list of the distant-site physician's or practitioner's privileges to CAH? d. the individual distant-site physician or practitioner holds a license issued or recognized by the State in which the CAH is located; and e. there is evidence of aCAH internal review of the distant-site physician's or practitioner's performance of these privileges and sends the information to the distant-site hospital. At a minimum, this information must include all adverse events that result from the | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> | <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> | | |

| TELEMEDICINE | | | | | |
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| telemedicine services provided by the distant-site physician or practitioner to the CAH's patients and all complaints the CAH has received about the distant-site physician or practitioner. C-0872 §485.616(c)(1)(2) | | | | | |
| If telemedicine services are provided through an agreement with a distant-site telemedicine entity , does the agreement specify that the distant-site telemedicine entity is a contractor of services to the CAH and furnishes the contracted services in a manner that enables the CAH to comply with all applicable conditions of participation? C-0874 §485.616(c)(3)(4) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| For services furnished through an agreement with a distant-site telemedicine entity , the CAH's governing body may choose to rely upon the credentialing and privileging decisions made by the governing body of the distant-site telemedicine entity regarding individual distant-site physicians or practitioners. Does the CAH's governing body ensure though the agreement the following provisions are met: | | | | | |
| a. the distant-site telemedicine entity's medical staff credentialing and privileging process and standards at least meet the following Medicare standards (b-g) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| b. determine, in accordance with State law, which categories of practitioners are eligible candidates for appointment to the medical staff | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| c. appoint members of the medical staff after considering the recommendations of the existing members of the medical staff | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| d. assure that the medical staff has bylaws | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| e. approve medical staff bylaws and other medical staff rules and regulations | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| f. ensure that the medical staff is accountable to the governing body for the quality of care provided to patients | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| g. ensure the criteria for selection are individual character, competence, training, experience, and judgment | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| h. ensure that under no circumstances is the accordance of staff membership or professional privileges in the hospital dependent solely upon certification, fellowship or membership in a specialty body or society. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |

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| i. the individual distant-site physician or practitioner is privileged at the distant-site telemedicine entity providing the telemedicine services. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| j. does the distant site entity provide a current list to the CAH of the distant-site physician's or practitioner's privileges at the distant-site telemedicine entity | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| k. the individual distant-site physician or practitioner holds a license issued or recognized by the State in which the CAH whose patients are receiving the telemedicine services is located | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| l. with respect to a distant-site physician or practitioner, who holds current privileges at the CAH whose patients are receiving the telemedicine services, the CAH has evidence of a CAH internal review of the distant-site physician's or practitioner's performance of these privileges and sends the distant-site telemedicine entity such information for use in periodic appraisal of the distant-site physician or practitioner. At a minimum, this information must include all adverse events that result from the telemedicine services provided by the distant-site physician or practitioner to the CAH's patients and all complaints the CAH has received about the distant-site physician or practitioner. C-0874 §485.616(c)(3)(4) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| For services furnished through an agreement with a distant site hospital OR distant-site telemedicine entity , does the CAH have | | | | | |
| a. documentation indicating that it granted privileges to each telemedicine physician and practitioner? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| b. documentation indicating the CAH's governing body made privileging decisions based on the privileging decisions of the distant-site telemedicine hospital or entity? If yes: | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| c. does the written agreement with the distant-site telemedicine hospital or entity address the required elements concerning the distant-site telemedicine entity's utilization of a medical staff credentialing and privileging process that meets the requirements of the hospital CoPs, licensure of telemedicine physicians and practitioners, current list of telemedicine physicians and practitioners with privileges at the distant-site telemedicine hospital or entity, and written review by the CAH of the telemedicine physicians' and practitioners' services? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |

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| C-0872 §485.616(c)(1)(2) C-0874 §485.616(c)(3)(4) | | | | | |

Key Resources and Links

- [\(note this information is already in Appendix W\)Appendix W—CAH Regulations and Interpretative Guidelines](#)
- [CMS CAH Basic Information Page \(includes crosswalk\)](#)
- [CMS CAH Basic Training](#)