


DEPARTMENT OF HEALTH AND HUMAN SERVICES  
OFFICE OF DIRECTOR

ACTION REFERRAL

TO <i>Liese</i>	DATE <i>2-7-12</i>
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DIRECTOR'S USE ONLY		ACTION REQUESTED	
1. LOG NUMBER <i>000304</i>	<input type="checkbox"/> I Prepare reply for the Director's signature DATE DUE _____		
2. DATE SIGNED BY DIRECTOR <i>CC: Mr. Steed</i> <i>Cleared 3/6/12, letter attached</i> 	<input checked="" type="checkbox"/> Prepare reply for appropriate signature DATE DUE <i>2-16-12</i> DATE DUE _____ <input type="checkbox"/> Necessary Action		

APPROVALS (Only when prepared for director's signature)	APPROVE	* DISAPPROVE (Note reason for disapproval and return to preparer.)	COMMENT
1.			
2.			
3.			
4.			

**RECEIVED**

FEB 06 2012

Department of Health & Human Services  
OFFICE OF THE DIRECTOR

Mr. Anthony E. Keck, Director  
South Carolina Department of Health and Human Services  
Post Office Box 8206  
Columbia, SC 29202

January 27, 2012

Dear Director Keck,

This letter is in support of proposed changes to Section 2 of the Medicaid Policy Manual regarding reimbursement for telehealth services. As a family nurse practitioner I am witness to the difficulties that citizens in rural areas have in terms of access to healthcare. As you know, telemedicine is a cost-effective alternative to the face-to-face traditional patient encounter. Although the current policy has improved patient access, it is limiting in certain areas of practice.

I am aware that you have recently met with fellow-members of the South Carolina Telehealth Workgroup including representatives from the South Carolina Office of Rural Health, the Medical University of South Carolina and the South Carolina Hospital Association. I fully support recommended amendments to the Medicaid Telemedicine Reimbursement Policy that will ensure that services covered by in-person visits are also covered by telemedicine visits and are covered at the same level as the equivalent in person visit. I also believe that the policy should ensure that the language does not limit the referring site, as long as in-person care would also be reimbursed at that site, and that the language does not limit the technology, with the exception of the excluding of telephone, fax and email only interactions. Furthermore, I would like assurance that the language does not limit by rural/urban location.

Finally, I am asking that the language is not limited to physicians, but also allows for other health professionals to utilize the technology to deliver care that would be reimbursed if in person. I am particularly interested in this change in the policy because I believe it will alleviate the burden of access to healthcare for children and youth aged 17 years and under which is a goal of Healthy People 2020. Presently, Medicaid will reimburse for telemedicine services that are "peer to peer", in other words, provider to provider. I am interested in being able to provide services to students in rural schools through telemedicine with the originating site being the school nurses' office. To make this happen, I am requesting that school health clinics, that are not rural health centers, be included. This will alleviate reimbursement issues when the originating site is a school health room and the provider is an off-site Nurse Practitioner.

I would love the opportunity to meet with you to discuss this innovative way of providing healthcare that is not only timely and efficient, but also alleviates the burden that emergency rooms experience when primary care is provided there as opposed to a primary care site.

Sincerely,



Gaye M. Douglas, RT, MEd, MSN, APRN-BC  
Family Nurse Practitioner

**Campus Health Center**  
 237 S. Georgetown Hwy  
 Johnsonville, S.C. 29555  
 (843) 386-2609



**Gaye M. Douglas, RT, MED, MSN, APRN-BC**  
 Family Nurse Practitioner  
 gdouglas@fios.k12.sc.us

**CAMPUS HEALTH CENTER**  
 Florence Co. Sch. Dist. Five  
 237 S. Georgetown Hwy.  
 Johnsonville, SC 29555  
 (843) 386-2609

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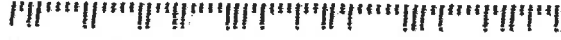


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Department of Health & Human Services  
 OFFICE OF THE DIRECTOR

*S.C.D.H.H.S.  
 Director Anthony Kerk  
 P.O. Box 8206  
 Columbia, SC 29202*



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DEPARTMENT OF HEALTH AND HUMAN SERVICES  
OFFICE OF DIRECTOR

ACTION REFERRAL

TO <i>Grisel Williams</i>	DATE <i>2-7-12</i>
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DIRECTOR'S USE ONLY		ACTION REQUESTED	
1. LOG NUMBER <i>100304</i>	<input type="checkbox"/> Prepare reply for the Director's signature DATE DUE _____  <input checked="" type="checkbox"/> Prepare reply for appropriate signature DATE DUE <i>2-16-12</i>  <input type="checkbox"/> FOIA DATE DUE _____  <input type="checkbox"/> Necessary Action		
2. DATE SIGNED BY DIRECTOR <i>EC: M. F. T. C. T.</i>			

APPROVALS (Only when prepared for director's signature)	APPROVE	* DISAPPROVE (Note reason for disapproval and return to preparer.)	COMMENT
1. <i>Vol Williams</i>	<i>3-6-12</i> <del><i>2-22-12</i></del>		
2. <i>BS Davis</i>	<i>3/6 OK</i>	<i>3/4</i>	
3.			
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March 6, 2012

Gaye M. Douglas, RT, MEd, MSN, APRN-BC  
Family Nurse Practitioner  
Campus Health Center  
237 South Georgetown Highway  
Johnsonville, South Carolina 29555

Dear Ms. Douglas:

Thank you for the letter regarding your suggested changes to the telemedicine policy. We welcome the opportunity to be of assistance.


The South Carolina Department of Health and Human Services (SCDHHS) met with various stakeholders over several months prior to updating the Medicaid telemedicine policy. We received valuable input and feedback as we developed the draft and final revisions.

The policy broadens access to specific treatment services and allows providers who are enrolled in the Medicaid Physician Services program to deliver these services when face to face contact is not necessary or not possible. This provides the opportunity for services both in rural and urban locations. We rely on the physician or practitioner to determine the appropriate mode of treatment to meet the needs of each beneficiary, and we expect the same level of quality and efficacy of care as we do in an in-person office visit. We believe that the policy is clear in allowing the use of electronic interactive equipment that permits two-way, real-time communications between the patient and the physician/practitioner.

Though your letter references policy regarding other health professionals. This policy is specific to services provided by physicians and nurse practitioners. We are happy to meet with you at SCDHHS or by conference call to learn more about your ideas. Ms. Valeria Williams, Program Director, will be contacting you for a follow-up.

We greatly appreciate your continued support in the South Carolina Medicaid program, as we all work to provide the best healthcare to the citizens of this State.

Sincerely,

  
Melanie "BZ" Giese, RN  
Deputy Director

MG/wm