



COLORADO

Department of Health Care
Policy & Financing

303 E. 17th Avenue
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Department Response to MSB eConsult Feedback

This document was prepared in response to the questions and concerns posed by members of the Medical Services Board at the board meeting on August 11th, 2023.

Stakeholder Engagement

Board members expressed that a separate platform would create barriers by adding time and effort to an existing process. What are the specific action steps for stakeholders to engage in system design?

The Department is seeking stakeholder input on these topics to understand what providers need to make this platform useful and minimize barriers to its adoption. Though stakeholder input may not immediately be implemented, it will be used to inform ongoing platform development.

The Department seeks stakeholder input throughout the development of the eConsult platform. Over the next several months HCPF will be presenting at many of our stakeholder groups, our next upcoming stakeholder meetings will be in October.

Provider and Community Experience Subcommittee: October 12, 2023, 8:00 am - 9:30 am. To find out more about this subcommittee and to view the meeting invite information, please visit the [Provider and Community Experience Subcommittee](#) web page.

Program Improvement Advisory Committee: October 18, 2023, 9:30 am -12:15 pm. To find out more about this committee and to view the meeting invite information, please visit the [Program Improvement Advisory Committee](#) web page.

Webinars: Several webinars are being hosted with the eConsult Vendor Safety Net Connect. Sign up for one of the upcoming webinars to access in-depth information about Colorado Medicaid eConsults and to have a chance to ask questions or share feedback.

Nov 29, 2023 08:00 AM-9:30 AM Mountain Time (US and Canada)
Topic: Enhancing Access with eConsults: General Overview
[Register in advance for this webinar](#)

Dec 6, 2023 08:00 AM-9:30 AM Mountain Time (US and Canada)
Topic: Enhancing Access with eConsults: General Overview
[Register in advance for this webinar](#)

Dec 13, 2023 08:00 AM-9:30 AM Mountain Time (US and Canada)

Topic: Enhancing Access: eConsult's for PCMPs

[Register in advance for this webinar](#)

Jan 10, 2024 08:00 AM-9:30 AM Mountain Time (US and Canada)

Topic: Enhancing Access: eConsult's for Specialty Providers

[Register in advance for this webinar](#)

Additional opportunities will be listed on the [eConsult Platform](#) web page.

Functionality of the eConsult Platform

Can psychologists and behavioral health providers submit eConsults as PCMPs and would they be reimbursed for the eConsult?

No, only PCMP's can request an eConsult. While psychologists and behavioral health providers may be involved in primary care, they aren't designated as PCMPs. For the purpose of this rule, PCMPs are defined as an individual physician, advanced practice nurse or physician assistant, who contracts with a Regional Accountable Entity (RAE) in the Accountable Care Collaborative (ACC), with a focus on primary care, general practice, internal medicine, pediatrics, geriatrics, or obstetrics and gynecology.

The Department will provide eConsult services for Addiction Medicine and Psychiatry. Specialty Providers in Addiction Medicine and Psychiatry who wish to receive eConsults can establish a contractual agreement with our vendor to participate.

What are the reimbursement amounts?

The Department will pay approximately \$17 to PCMPs per consult completed using an approved platform. The Department will pay the vendor \$35 for every closed consult. The vendor is responsible for paying the Specialty Providers.

Who are the consulting specialists? Are they out-of-state vs. in-state?

Consulting specialists may be in-state or out-of-state.

Every Specialty Provider, whether they practice within Colorado or outside of the state, must be both enrolled as a Health First Colorado Provider and have a license to practice within the state of Colorado.

Building a network of Specialty Providers based in Colorado is a key focus of this program. In cases where a Colorado-based Specialty Provider is unable to respond to an eConsult the eConsult vendor will maintain a network of providers located outside of Colorado.

PCMPs will be given priority in choosing a Specialty Provider of their preference, provided that the chosen Specialty Provider is not currently fully occupied with pending eConsults awaiting responses. If the chosen Specialty Provider is at capacity, eConsults will be sent to

the next available Specialty Provider. This approach fosters provider relationships and widens our network to benefit Member access to specialty services.

The specialties currently required in the eConsult vendor's contract are:

Adult Specialties: Addiction Medicine; Allergy and Immunology; Cardiology; Dermatology; Endocrinology; Gastroenterology; Hepatology; Geriatric Medicine; OB/Gynecology; Hematology; Infectious Disease; Nephrology; Neurology; Oncology; Ophthalmology; Orthopedics; Otolaryngology (Ear, Nose, and Throat (ENT)); Pain Medicine; Physical Med/Rehab; Psychiatry; Pulmonology, including Sleep Medicine; Rheumatology; Urology.

Pediatric Specialties: Allergy and Immunology; Cardiology; Dermatology; Developmental Pediatrics, Endocrinology, Gastroenterology; Infectious Disease; Nephrology; Neurology; Oncology; Ophthalmology; Orthopedics; Otolaryngology (ENT); Psychiatry; Pulmonology; Rheumatology; Urology.

Would PCMPs only be able to be paid if they submit their claim through the eConsult platform?

PCMPs will submit their claim for eConsults completed using an approved platform to the MMIS and will be paid fee-for-service.

Additional Questions

Is eConsult the same as telemedicine?

eConsults are part of telemedicine and are included under the telemedicine section of rule because they are an electronic communication.

Providers have expressed that the requirement to use an approved platform is creating, not lifting barriers.

The use of an approved platform is only a requirement for payment purposes. The Department's eConsult platform offers an extra avenue for PCMPs to establish connections with Specialty Providers to enhance accessibility for our Members.

The Department may only reimburse when an approved platform is used to ensure compliance with CMS guidance. This rule does not impose any limitations on providers use of alternative platforms or consultation methods.

Is a third party creating this platform? This could be laborious for the Department's IT.

Yes, a third party platform is implementing the platform. The Department completed an Invitation to Negotiate (ITN) and selected an external vendor with significant experience implementing eConsult platforms to implement the state's eConsult Platform.

Adding more work when providers seem to already have systems in place that work for them seems like a waste of time and money.

Providers who already have a system in place need not implement the Department's platform. The Department's platform will create another option for providers to use when they do not have access to a tool.

The proposed rule is necessary to allow payment to providers for utilizing the platform and aligns our regulations with the requirements for eConsults outlined by CMS and our recently approved SPA. Without approval of this rule, we will be unable to pay providers for use of the Department's eConsult platform.

The platform design has been approved by CMS and the eConsult vendor has been selected and is currently in the process of implementing the Department's platform. These elements are outside of the scope of this rule.

Why do providers have to communicate on the Department's platform? Is there a concern that providers will be consulting when they're really not?

Providers do not have to use the Department's eConsult platform to communicate. Providers will need to use a Department approved eConsult platform to receive reimbursement.

The platform will ensure services meet our payment parameters, which are based on CMS guidance.

At this time, the Department's eConsult platform is the only approved eConsult platform.

In the future can the Department look at paying specialists multiple ways?

Yes, this is something that the Department will consider.

Data

Is building an infrastructure cheaper than integrating EPIC or other EMR's? Define expensive, how much money would that be?

Option	Provider Cost	Department Cost
Single Sign On (SSO)	\$0	Included in contract
EHR/HIE integration per instance	~\$10,000 - \$60,000	Total included in contract: 8 Additional: ~\$70,000 each

The decision to build a platform was made to ensure equitable access to eConsults for all of our Members, regardless of the EMR their provider uses. In order to allow for eConsults for members whose providers may not have access to the tool, our platform implementation has a goal of allowing multiple modalities of access, including; direct access via web portal, single sign on integration via HIE, and varying levels of EHR integration.

What have other states done?

Other states have used "secure provider portals" and/or an "online HIPAA-compliant patient portal".

Due to the changes in CMS guidance regarding eConsults, there is limited information about other states' programs.

The Center for Connected Health Policy has compiled information regarding state Medicaid agencies use of store and forward technology here: <https://www.cchpca.org/topic/store-and-forward/>.