certintell®
TELEHEALTH

White Paper

Tactics for Building an RPM

Risk Reduction Plan and Maximizing Quality Improvement

Table of Contents

. . . .

Remote Patient Monitoring (RPM) has certainly proved to be one of the most valuable tools in the healthcare industry in the past decade.

While there are plethora of resources and RPM solutions designed to help health systems succeed when procuring the service, decisions should not be implemented without prior provisions put in place. Risk management considerations are needed before and during implementation, as well as after to ensure continued success.

> *"The goal of risk management is to reduce errors and safeguard the healthcare organization from the financial stress of medical malpractice claims or insurance reimbursement denials."*[1]

Especially for community-based organizations, complex regulations surrounding RPM and care management services similar to it can be a convoluted situation to navigate. **But this white paper aims to help you implement the best practices and minimize your risk for adverse events related to RPM and telehealth services.**

Checklist: The Basics of Risk Protection

Before you begin offering RPM and telehealth services, you'll need to check these basic items off your preparation checklist[2]:

1 **Become aware of any state-specific laws that dictate how you must collect and store protected health information.** To do so, you can visit <u>State Health Care Law</u> or reach out to your regional Telehealth Resource Center for additional assistance.

2 **Health systems should consider incorporating references to telehealth or RPM in their Notice of Privacy Practices.** Any RPM equipment can also be mentioned in your Security Risk Assessment, an act which ensures that staff receive privacy and security training specific to telehealth practices.

3 **Training designed for the launch or scale of telehealth services should typically be mandated.** HIPAA training is integral to a low-risk environment. This training could cover subjects such as information security, common reasons behind breaches, and the consequences protocol noncompliance would impose.

4 **Teams handling sensitive patient information drawn from any telehealth visits or RPM readings should err on the side of small.** During the making of a risk management strategy, leaders should be sure to designate staff that will specifically be in charge of disclosing health related information, when and if needed. It might be beneficial to monitor staff for inappropriate access to protected health information.

Why RPM Risk Management is Not Scary

While implementing an RPM program must be done correctly, it does NOT have to be daunting.

> *"Risk Management and Quality Improvement Practices often go hand in hand,"* says the author of <u>this blog</u> educating on risk management in healthcare.

ECRI, a global authority on healthcare technology and safety, recommends that the leaders of both initiatives within an organization **come together to synchronize their common goals and processes.** Doing so will eliminate superfluous overlaps and ensure all concerns are addressed because they are being solved through a unified process. **This will require harmonized data collection, analysis, monitoring and evaluation.**[3]

"Maintaining high clinical quality will increasingly impact financial performance and reduce the risk of brand impairment as reimbursement moves away from a fee-for-service model and towards a greater emphasis on value and outcomes," the authors of <u>this NEJM Catalyst article</u> state.

The authors call this holistic approach "**Enterprise Risk Management,**" or ERM. In the authors' definition, ERM includes traditional facets of risk management, such as patient safety and medical liability, and joins them with a "big picture" approach to risk across the whole organization. These aspects of risk management then include all of the following[4]:
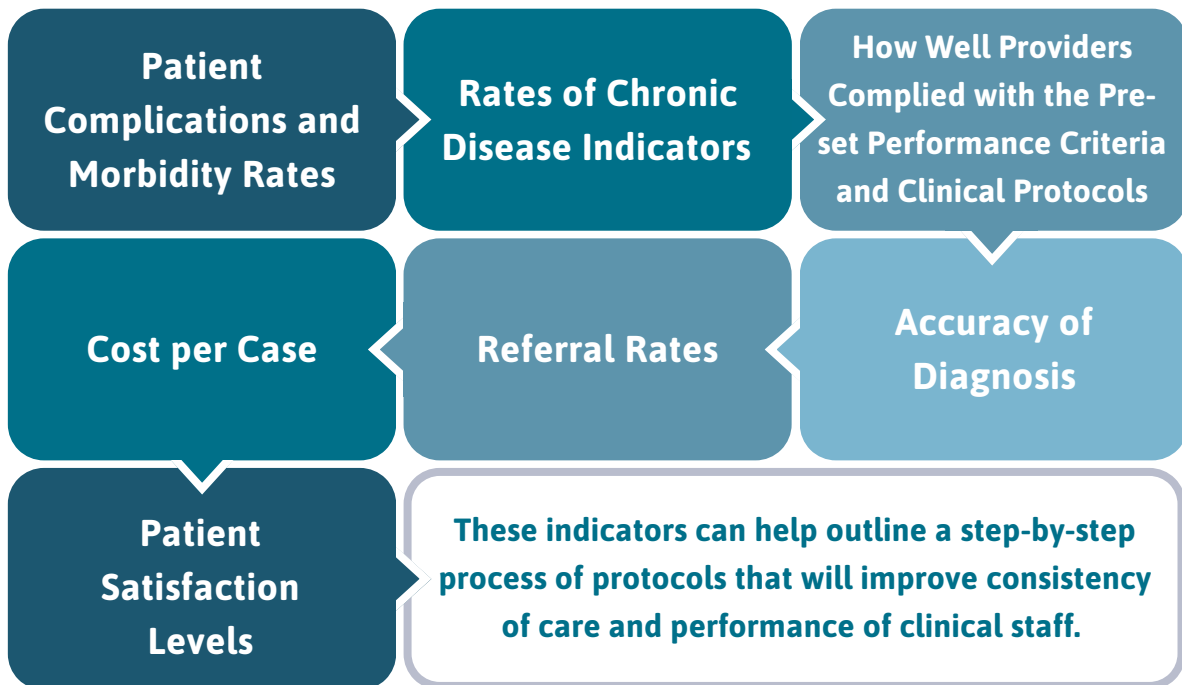
Operational	Human Capital
Clinical and Patient Safety	Legal and Regulatory
Strategic	Technological
Financial	Environmental and Infrastructure-Based Hazards

ERM

ERM, says the American Society for Healthcare Risk Management, maximizes value protection and creation.[5]

This holistic method underscores the use of technology to aid in these synchronization efforts to remove risk associated with siloed departments or business units. **Data analytics should be an embedded part of the decision-making, risk prioritization, and resource allocation processes.** Analytics can monitor benchmarks as a way of showing value, such as what costs were circumvented, for example.[5]

Executing a risk management plan for RPM services naturally improves care quality anyways. **The data gleaned from RPM can be used to standardize protocols.**

Indicators healthcare organizations can employ to improve risk management and quality include[4]:

Patient Complications and Morbidity Rates	**Rates of Chronic Disease Indicators**	**How Well Providers Complied with the Pre-set Performance Criteria and Clinical Protocols**
Cost per Case	**Referral Rates**	**Accuracy of Diagnosis**
Patient Satisfaction Levels	**These indicators can help outline a step-by-step process of protocols that will improve consistency of care and performance of clinical staff.**	

Once you have the initial preparation done, you can dive into risk management strategies for specific stakeholders, most notably, patients and staff. These two groups arguably pose the biggest area of concern.

Mitigating Patient Safety

Let's start with a few tips to mitigate risks associated with patient safety[6]:

TIP #1

Develop a set of **protocols** that describe how patients should operate RPM devices

TIP #2

Inform patients of **"available hours"** and the limitations of remote monitoring

> If patients are allowed to transmit information 24/7, the healthcare organization would be legally responsible for developing and implementing a process for evaluating patient data in a timely manner to avoid any delays in treatment.

Certintell's RPM Program comes equipped with Care Managers who have a triage system in place up-front!

TIP #3

Before transmitting any protected health information, obtain **written permission** from the patient

TIP #4

Educate patients on what counts as an emergency reading and how they should act accordingly, whether that be calling 911 or going to the emergency department

TIP #5

Inform patients on the **risks** in the case of device failure, malfunction or malware infiltration

Certintell Care Managers also call patients to troubleshoot any issues with devices in a prompt manner, on an as-needed basis.

Mitigating Clinical Safety

Clinician mishaps when servicing RPM can be avoided with the right precautions in measure. A solid foundation for minimal risk starts with providing employee education. Employees should be informed of the overall strategy behind the risk management scheme, including tangible steps they can take to prevent and to respond. Increased employee participation makes your risk-management strategy a part of company culture, rather than a one-off consideration.

While training can be as comprehensive as your organizations wants, they should always address, at minimum, these following five competencies[4]:

1 How to **communicate** with the patient about their RPM program, which could include what verbiage they should use or how they should explain any patient responsibilities, financial or health-wise

2 What **scope of services** this specific telehealth program entails. RPM services include assessment, patient education, data collection, monitoring and analysis for it to work successfully and be within legal limits

3 Employees should be relatively familiar with the **technology** used for RPM, such as the devices and connected portal

4 Be knowledgeable about RPM **operational protocols and procedures** and any updates that are necessary

5 Be able to respond to any **device malfunctions** or other unexpected troubles

RELY ON CERTINTELL

While these competencies are critical for a safe and successful RPM program, Certintell is here for you! Our Care Managers work with points of contact at health centers to assist with RPM education for patients and providers; troubleshoot device malfunction with patients; and provide a detailed operational policy that ensures maximum success.

Quality Improvement and Risk Management in Tandem

As stated before, quality improvement and risk management efforts can often go hand in hand. **Measuring outcomes can offer health systems insights into how well an RPM program is performing.** As a result of this awareness, health teams can refine where needed and support ongoing improvement.

Patient and provider satisfaction can be one of the most advantageous indicators to measure, as it captures actual perceptions of an RPM program. **Satisfaction surveys can reveal patterns in utilization and barriers to care that may be currently unknown.**[4]

Of course, the possibility of unfavorable incidents is never zero. Rather than focusing on incident reporting as purely a negative, some researchers argue that this should be seen as a positive, honest action that works in the best interest of staff and patients.[3]

"A successful reporting culture is established with a focus on patient safety, and a perspective that all parties involved in the organization – families, patients, actioners and leaders – are responsible and should be active participants."[3]

Record Keeping

When you've successfully established a risk management plan, hopefully using some of the strategies provided in this paper, be sure to maintain a comprehensive record of telehealth interactions and subsequent actions taken. Using standardized intake and consultation forms can help teams stay consistent, and therefore, compliant.

Any clinicians participating in the procurement of RPM or telehealth services should be instructed to promptly document any adverse events and escalate them to senior staff, or as otherwise directed in the written policy.

Check out these American Telemedicine Association templates for consistent documentation of evaluation and consultations:

https://thesource.americantelemed.org/resources/telemedicine-forms

How Certintell Can Help

Certintell is the leading expert in RPM and telehealth for health organizations focusing on underserved populations. We work extensively with your team to define clinical and operational policies that set you up for success and reduce the risk of any adverse events related to RPM. We are here to help you improve the quality of your chronic care management offerings, assisting you with administrative burdens whenever we can.

Get in touch today to learn more about improving your organization's quality of care!
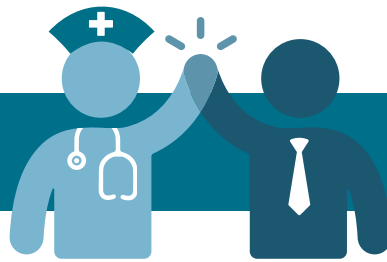
The information provided on this post does not, and is not intended to, constitute legal advice; instead, all information, content, and materials available on this site are for general informational purposes only.

certintell
TELEHEALTH

Certintell is a care management company that enables safety-net providers to make a lasting impact on the health of underserved patients through telehealth. We do this by using our in-depth expertise in health care and health information technology to anticipate — and meet — the needs of health care payers, providers and patients.

Closing the Care Gap™

SOURCES:

[1] "Risk Management in Healthcare: What It Is and Why It Matters." Dignity Health Global Education, dhge.org/about-us/blog/risk-management-in-healthcare#:~:text=The%20goal%20of%20risk%20management,can%20improve%20their%20risk%20profile. Accessed 12 Sept. 2023.

[2] "Legal Considerations." telehealth.hhs.gov, 11 May 2023, telehealth.hhs.gov/providers/legal-considerations.

[3] "9 Strategies for Risk Management in Healthcare." Florida Tech Online, 28 July 2020, www.floridatechonline.com/blog/healthcare-management/risk-management-in-healthcare-best-practices.

[4] Washington State Nurses Association. "Telemedicine: Risk Management Issues, Strategies and Resources." WSNA, July 2018, www.wsna.org/news/2018/telemedicine-risk-management-issues-strategies-and-resources.

[5] "What Is Risk Management in Healthcare?" NEJM Catalyst, 25 Apr. 2018, catalyst.nejm.org/doi/full/10.1056/CAT.18.0197.

[6] "Safely Incorporate Remote Patient Monitoring Into Your Practice." Texas Medical Association, 26 May 2020, www.texmed.org/TexasMedicineDetail.aspx?id=53660.

The information provided on this post does not, and is not intended to, constitute legal advice; instead, all information, content, and materials available on this site are for general informational purposes only.

certintell
TELEHEALTH

How to Contact Us:

1-800-946-9143

Info@Certintell.com

Closing the Care Gap™