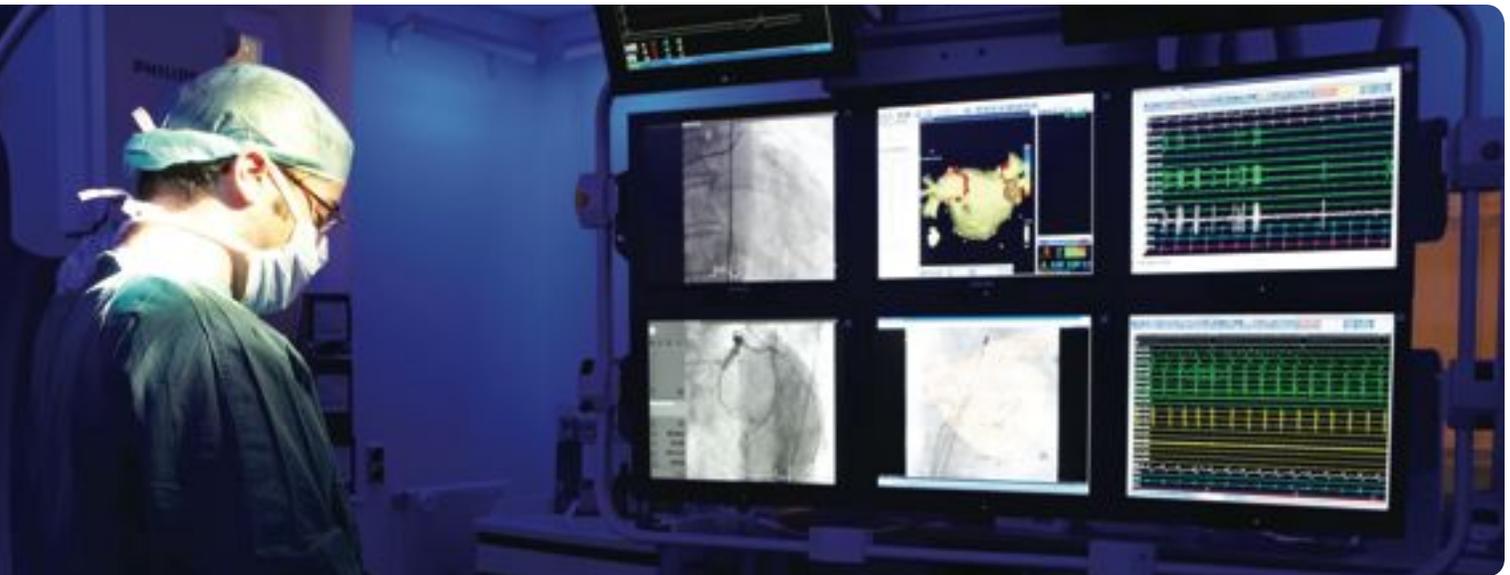


Mitigating telemedicine risk

Checklist for healthcare providers



Equipment

- Clearly outline the responsibilities of both the distant site hospital and the telemedicine service provider when it comes to purchasing and maintaining equipment. Also, have an on-going process in place to guarantee equipment is working.
- Involve the IT department early when transitioning to a telemedicine service model to ensure that appropriate systems for transmitting and receiving data are used.
- Create back-up plans for scheduling and conducting treatments and appointments in the event of an equipment failure. Determine how facilities will share information if an adverse event occurs.
- Develop technical standards for equipment that assure the smooth and secure transmission of data, specifically addressing:
 - The interoperability of systems.
 - Verification of receipt of data and results.
 - Technical support availability.

- Ability to notify both parties of any technical difficulties.
- Appropriate security for equipment storing and transmitting data that is in compliance with federal and state regulations.

Security and privacy

- Establish guidelines for sharing data with telemedicine providers to minimize the risk of patient information being compromised.
- Identify which organization will store electronic images and data. Verify that data will be held in accordance with record retention requirements, and that proper technology safeguards are in place to make certain personal health records are stored in compliance with HIPPA regulations.
- Documentation should include mode of service delivery, which sites were linked, and who attended the sessions.
- Determine how digital information like images and video consultations will be stored in a patient's EHR.
- Determine and communicate how follow-up information will be given to the patient and the referring physician.

Credentialing, licensing and peer review

- Institute a performance review process of the telemedicine provider that ensures:
 - It is compliant with current CMS Conditions of Participation regarding credentials and standards of care for the facility and its practitioners.
 - All practitioners—physicians and non-physicians—are performing their intended duties and not providing care outside their scope of practice.
 - A process is in place describing how and how often the hospital will provide information regarding physician performance on an on-going basis.
- A telemedicine service provider should hold a license issued or recognized by the state where a hospital's patients are physically located. Check state statutes to determine any state requirements for physician licensure of telemedicine providers.
- Outline the specific responsibilities of the telemedicine provider's governing body.
- By-laws or policies that require the physical presence of a physician should be reviewed and revised as necessary.

Informed consent

- Institute policies and procedures that inform patients of their rights and responsibilities regarding their treatment via telemedicine.
- Physicians must be equally aware of informed consent practices so they can implement them consistently.
- Carefully document patient authorization to receive care through telemedicine.

Insurance

- Insurance provisions should be included in the telemedicine agreement, and should include:
 - Mutual hold harmless and indemnification provisions.
 - Required insurance limits.

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