Telehealth Impact on 2024 Uniform Data System (UDS) Clinical Quality Measure Reporting

Purpose

- The table is intended to help health centers determine how services to patients provided via telehealth[1] should be considered for the UDS clinical quality measure (CQM) denominator, numerator, and exclusion/exception reporting on Tables 6B and 7.
- This crosswalk aligns with the Centers for Medicare & Medicaid Services (CMS) Telehealth Guidance for Electronic Clinical Quality Measures (eCQMs) for Eligible Clinician 2024 Quality Reporting guidance: https://ecqi.healthit.gov/sites/default/files/2024-EC-Telehealth-Guidance.pdf.
- This is not intended to provide guidance on federal and state regulations or restrictions on the use of telehealth. As the public health emergency telehealth rules are being reinterpreted by states and payers, it may be that local services and modality directives differ from those summarized in this document.
- Guidance provided is limited to the measure specifications and guidance provided by CMS.

Requirement

- Health centers are to identify the number of patients meeting each measure's criteria in three components:
  - Denominator: Patients who fit the detailed criteria described for inclusion in the specific measure to be evaluated.
  - Numerator: Patients (included in the denominator) that meet the measurement standard for the specified measure.
  - Exclusions/Exceptions: Patients who should not be included in the denominator.

Table Notes

- Each of the UDS CQMs are included as separate rows, with their corresponding CMS CQM number.
- The denominator exclusions (patient records removed from the denominator before determining if numerator criteria are met) and the denominator exceptions (patient records removed from the denominator because they meet specified exception criteria) are extracted from the full reporting criteria.
- Current Procedural Terminology (CPT) or Healthcare Common Procedure Coding System (HCPCS) codes used to identify eligible patient encounters used for identification of a patient for the denominator need to be identified by reviewing the eCQM criteria specifications, value sets, and codes directly.
- Not all services must be performed/completed at a visit at the health center.

Column Considerations

- *Denominator:*
  - This column defines whether a telehealth visit meets the denominator requirement for the measure.
  - There is variation among the measures as to whether (or not) the telephone evaluation and management (E/M) services provided by a physician or physician equivalent (e.g., NP, PA, CNM) constitute a denominator eligible encounter.

[1] The term "telehealth" includes "telemedicine" services, but encompasses a broader scope of remote health care services. Telemedicine is specific to remote clinical services, whereas telehealth may include remote non-clinical services, such as provider training, administrative meetings, and continuing medical education, in addition to clinical services.

Telephone E/M Billing Codes - Audio only synchronous physician or physician equivalent visits	
CPT 99441	Telephone evaluation and management service provided by a physician to an established patient, parent, or guardian not originating from a related E/M service provided within the previous 7 days nor leading to an E/M service or procedure within the next 24 hours or soonest available appointment: 5-10 minutes of medical discussion
CPT 99442	As above but 11-20 minutes of medical discussion
CPT 99443	As above but 21-30 minutes of medical discussion

- *Numerator:*
  - This column defines whether a telehealth visit meets the numerator requirement for the measure.
  - Verification of completed services can be done outside of a visit for some measures.
    - For example, a mammogram cannot be completed via telehealth. However, if the patient had a mammogram performed during the measurement period (or identified timeframe) and documentation is included in the patient record, the patient record could be considered compliant for the Breast Cancer Screening measure.
  - To determine if the measurement standard is met, review the associated eCQM guidance. Some require the service to be performed by, paid for, or approved by the health center provider.

Resources

- 2024 UDS Manual
- CMS 2024 Eligible Physician/Eligible Clinician Telehealth Guidance
- List of Medicare Telehealth Services 2024 (updated 11/13/2024)
- eCQI Resource Center
- Value Set Authority Center (VSAC)
- eCQM Issue Tracking
- Center for Connected Health Policy
- UDS Support Line and BPHC Contact Form

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Note: Items highlighted in pink are intended to draw attention to measure components that do not permit services via telehealth.

Clinical Measure Name, eCQM Code, UDS Table, and UDS Section	Include patients with telehealth only visits on UDS Tables 6B and 7, Column A (Denominator)?	Are telephone E/M services (physician or equivalent, CPT 99441-99443) included in Column A (Denominator)?	Can service, test, or procedure be done by telehealth to meet UDS Tables 6B and 7, Columns C or F (Numerator), requirements?
Early Entry into Prenatal Care, no eCQM Table 6B, Lines 7-9	No. Prenatal care patients are defined based on a comprehensive in-person prenatal physical exam. Prenatal care patients established in the prior year (through a comprehensive in-person exam) and only seen through telehealth in the current year **should** be included.	No. Prenatal care patients are defined based on a comprehensive in-person prenatal physical exam. Prenatal care patients established in the prior year (through a comprehensive in-person exam) and only seen through telehealth in the current year **should** be included.	Yes. Identification of trimester of entry may be identified in this way.
Childhood Immunization Status, CMS117v12 Table 6B, Line 10	Yes	Yes	No. Administration of immunizations are not acceptable in this way. These services cannot be conducted via telehealth.
Cervical Cancer Screening, CMS124v12 Table 6B, Line 11	Yes	Yes	No. Cervical cytology/HPV testing are not acceptable in this way. These services cannot be conducted via telehealth.
Breast Cancer Screening, CMS125v12 Table 6B, Line 11a	Yes	Yes	No. Mammograms are not acceptable in this way. These services cannot be conducted via telehealth.
Weight Assessment and Counseling for Nutrition and Physical Activity for Children/ Adolescents, CMS155v12 Table 6B, Line 12	Yes	Yes	No. Height and weight are to be performed by health center staff or paid for by health center. Yes. Counseling for physical activity and nutrition are acceptable in this way.
Preventive Care and Screening: Body Mass Index (BMI) Screening and Follow-Up Plan,	No. This screening measure requires therapy, treatment, or assessment	No	No. Height and weight are to be performed by health center staff or paid for by the health center.

Clinical Measure Name, eCQM Code, UDS Table, and UDS Section	Include patients with telehealth only visits on UDS Tables 6B and 7, Column A (Denominator)?	Are telephone E/M services (physician or equivalent, CPT 99441-99443) included in Column A (Denominator)?	Can service, test, or procedure be done by telehealth to meet UDS Tables 6B and 7, Columns C or F (Numerator), requirements?
CMS69v12 Table 6B, Line 13	that cannot be conducted via telehealth. Telehealth encounters of any kind do not meet the eligible visit requirements for this measure.		Yes. A follow-up plan is acceptable in this way.
Preventive Care and Screening: Tobacco Use: Screening and Cessation Intervention, CMS138v12 Table 6B, Line 14a	Yes	Yes	Yes. Screening for tobacco use and cessation intervention are acceptable in this way.
Statin Therapy for the Prevention and Treatment of Cardiovascular Disease, CMS347v7, Table 6B, Line 17a	Yes	No	Yes. Prescription or an order for statin therapy is acceptable in this way.
Ischemic Vascular Disease (IVD): Use of Aspirin or Another Antiplatelet, CMS347v7 Table 6B, Line 18	Yes	Yes. Even though these codes are not included in the specification (since this measure is no longer updated), these are allowed.	Yes. Medication list inclusion (of aspirin or antiplatelet) is acceptable in this way.
Colorectal Cancer Screening, CMS130v12 Table 6B, Line 19	Yes	Yes	No. Procedures (flexible sigmoidoscopy and colonoscopy) and diagnostic studies (CT colonography) are not acceptable in this way. These services cannot be conducted via telehealth. Yes. An FOBT or Stool deoxyribonucleic acid (DNA) (sDNA) with fecal immunochemical test (FIT)-DNA that is mailed and processed by a lab are acceptable.
HIV Linkage to Care, no eCQM, Table 6B, Line 20	Yes	Yes.	Yes. At the discretion of the healthcare and prescribing provider, the medical visit may be conducted and HIV treatment are acceptable in this way.

Clinical Measure Name, eCQM Code, UDS Table, and UDS Section	Include patients with telehealth only visits on UDS Tables 6B and 7, Column A (Denominator)?	Are telephone E/M services (physician or equivalent, CPT 99441-99443) included in Column A (Denominator)?	Can service, test, or procedure be done by telehealth to meet UDS Tables 6B and 7, Columns C or F (Numerator), requirements?
HIV Screening, CMS349v6, Table 6B, Line 20a	Yes	No	No. Patient attestation or self-report of HIV results is not acceptable in this way. Yes. HIV self-tests may be acceptable; the provider must receive documentation of the lab test result.
Preventive Care and Screening: Screening for Depression and Follow-Up Plan, CMS2v13 Table 6B, Line 21	Yes	Yes	Yes. Screening for depression and follow-up plan are acceptable in this way.
Depression Remission at Twelve Months, CMS159v12 Table 6B, Line 21a	Yes	Yes	Yes. Identification of remission achieved is acceptable in this way.
Dental Sealants for Children between 6–9 Years, CMS277v0,, Table 6B, Line 22	Yes	Yes. Even though these codes are not included in the specification (since this measure is no longer updated), these are allowed.	No. Application of sealants is not acceptable in this way. These services cannot be conducted via telehealth.
Low Birth Weight, no eCQM, Table 7, Section A	Yes (for existing prenatal care patients who had a delivery during the year).	Yes (for existing prenatal care patients who had a delivery during the year).	Yes. Birth weights may be identified in this way.

Clinical Measure Name, eCQM Code, UDS Table, and UDS Section	Include patients with telehealth only visits on UDS Tables 6B and 7, Column A (Denominator)?	Are telephone E/M services (physician or equivalent, CPT 99441-99443) included in Column A (Denominator)?	Can service, test, or procedure be done by telehealth to meet UDS Tables 6B and 7, Columns C or F (Numerator), requirements?
Controlling High Blood Pressure, CMS165v12 Table 7, Section B	Yes	Yes	Only blood pressure readings performed by a clinician or an automated blood pressure monitor or device are acceptable for numerator compliance with this measure. This includes blood pressures taken in person by a clinician and blood pressures measured remotely by electronic monitoring devices capable of transmitting the blood pressure data to the clinician. At the discretion of the clinician, blood pressure readings taken by an automated blood pressure monitor or device and conveyed by the patient to the clinician may also be acceptable.
Diabetes: Hemoglobin A1c (HbA1c) Poor Control (>9 percent), CMS122v12 Table 7, Section C	Yes	Yes	No. HbA1c lab test is not acceptable in this way. These services cannot be conducted via telehealth.

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