

## Telehealth Impact on 2022 Uniform Data System (UDS) Clinical Measure Reporting

**Purpose:**

- The table is intended to help health centers determine how services to patients provided via telehealth<sup>1</sup> should be considered for the three measure components.
- This guidance applies only to UDS clinical measure denominator, numerator, and exclusion/exception reporting on Tables 6B and 7.
- This crosswalk applies the Centers for Medicare & Medicaid Services (CMS) [2022 Eligible Physician/Eligible Clinician Telehealth Guidance](#) on telehealth visits to electronic clinical quality measure (eCQM) reporting standards.
- This is not intended to provide guidance on federal and state regulations or restrictions on the use of telehealth.

**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 clinical measures are included as separate rows, with their corresponding CMS eCQM number.
- Current Procedural Terminology (CPT) or Healthcare Common Procedure Coding System (HCPCS) codes used to identify eligible patient visits used for identification of a patient for the denominator need to be identified by reviewing the eCQM criteria and codes directly.
- Exclusions/exceptions are generally able to be determined through characteristics outside of a visit.
- Verification of already performed/completed services does not require a visit.

**Column****Considerations:***Denominator:*

- This column is limited to defining whether patients whose only visit(s) during the year where the measure was addressed are provided via telehealth are to be included.

*Numerator:*

- This column considers activity of all patients included in the denominator, which may include in-person and/or telehealth visits.
- Verification of completed services can be done outside of a visit.
- 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 meet the measurement standard, review the associated eCQM guidance. Some require the service to be performed by, paid for, or approved by the health center provider.
- There is inconsistency between the measures as to whether (or not) the telephone evaluation and medicine

<sup>1</sup> 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.

(E&M) services provided by a physician or physician equivalent (e.g., NP, PA, CNM) constitute a denominator eligible encounter.

Telephone E/M 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

**Resources:**

- [2022 UDS Manual](#)
- CMS [2022 Eligible Physician/Eligible Clinician Telehealth Guidance](#)
- [List of Medicare telehealth services effective June 16, 2022](#) (updated 6/16/2022)
- [eCQI Resource Center](#)
- [Value Set Authority \(VSAC\)](#)
- [eCQM Issue Tracking](#)
- [UDS Support Line](#)
- Please visit the [Center for Connected Health Policy](#) for important telehealth policy issues and key telehealth policy resources.

## Telehealth Impact on 2022 Uniform Data System (UDS) Clinical Measure Reporting

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

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?	Do documented services performed by external providers (not paid for or performed by the health center) count in UDS Tables 6B and 7, Columns C or F (Numerator)?
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 <b>should</b> 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 <b>should</b> be included.	Yes. Trimester of entry may be identified in this way.	Yes
Childhood Immunization Status, <a href="#">CMS117v10</a> Table 6B, Line 10	Yes	Yes	No. Administration of immunizations are not acceptable in this way. These services cannot be conducted via telehealth.	Yes
Cervical Cancer Screening, <a href="#">CMS124v10</a> Table 6B, Line 11	Yes	Yes	No. Cervical cytology/HPV testing are not acceptable in this way. These services cannot be conducted via telehealth.	Yes
Breast Cancer Screening, <a href="#">CMS125v10</a> Table 6B, Line 11a	Yes	Yes	No. Mammograms are not acceptable in this way. These services cannot be conducted via telehealth.	Yes

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?	Do documented services performed by external providers (not paid for or performed by the health center) count in UDS Tables 6B and 7, Columns C or F (Numerator)?
Weight Assessment and Counseling for Nutrition and Physical Activity for Children and Adolescents, <a href="#">CMS155v10</a> Table 6B, Line 12	Yes	Yes	No. Height and weight are not acceptable in this way.	No. Height and weight are to be performed or paid for by health center staff.
			Yes. Counseling for physical activity and nutrition are acceptable in this way.	No. Counseling for physical activity and nutrition are to be performed or paid for by health center staff.
Preventive Care and Screening: Body Mass Index (BMI) Screening and Follow-Up Plan, <a href="#">CMS69v10</a> Table 6B, Line 13	No. This screening measure requires therapy, treatment, or assessment that cannot be conducted via telehealth. Telehealth encounters of any kind do not meet the eligible visit requirements for this measure.	No	No. Height and weight are not acceptable in this way.	No. Height and weight are to be performed or paid for by health center staff.
			Yes. Follow-up plan is acceptable in this way.	Yes. Documentation of a referral for nutrition counseling or providing counseling during a telehealth visit for patients with low or high BMI would meet that specific part of the numerator requirements.
Preventive Care and Screening: Tobacco Use: Screening and Cessation Intervention, <a href="#">CMS138v10</a> Table 6B, Line 14a	Yes	Yes	Yes. Screening for tobacco use and cessation intervention are acceptable in this way.	No. Screening for tobacco use is to be performed or paid for by health center staff.
				Yes. Cessation intervention may be referred out.

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?	Do documented services performed by external providers (not paid for or performed by the health center) count in UDS Tables 6B and 7, Columns C or F (Numerator)?
Statin Therapy for the Prevention and Treatment of Cardiovascular Disease <a href="#">CMS347v5</a> Table 6B, Line 17a	Yes	No	Yes. Prescription or an order for statin therapy is acceptable in this way.	Yes
Ischemic Vascular Disease (IVD): Use of Aspirin or Another Antiplatelet, <a href="#">CMS164v7</a> Table 6B, Line 18	Yes	Yes. Even though these codes are not included in the specification (since this measure is no longer updated), these were allowed for 2021 and will continue to be allowed for 2022.	Yes. An order for medication (of aspirin or antiplatelet) is acceptable in this way.	Yes
Colorectal Cancer Screening, <a href="#">CMS130v10</a> Table 6B, Line 19	Yes	Yes	No. Procedures (Flex Sig and Colonoscopy) and diagnostic studies (CT colonography) are not acceptable in this way. These services cannot be conducted via telehealth.	Yes
			Yes. An FOBT or FIT-DNA that is mailed and processed by a lab are acceptable.	Yes
HIV Linkage to Care, no eCQM, Table 6B, Line 20	Yes	Yes. These were allowed for 2021 and will continue to be allowed for 2022.	Yes. At the discretion of the healthcare and prescribing provider, the medical visit may be conducted and HIV treatment are acceptable in this way.	Yes

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?	Do documented services performed by external providers (not paid for or performed by the health center) count in UDS Tables 6B and 7, Columns C or F (Numerator)?
HIV Screening, <a href="#">CMS349v4</a> 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.	Yes
Preventive Care and Screening: Screening for Depression and Follow-Up Plan, <a href="#">CMS2v11</a> Table 6B, Line 21	Yes	No <i>(Note: will be added for 2023 reporting)</i>	Yes. Screening for depression and follow-up plan are acceptable in this way.	No. Screening for depression and development of follow-up plan are to be performed or paid for by health center staff.  Yes. Follow-up plan may include a referral to another provider.
Depression Remission at Twelve Months, <a href="#">CMS159v10</a> Table 6B, Line 21a	Yes	Yes	Yes. Identification of remission achieved is acceptable in this way.	Yes
Dental Sealants for Children between 6–9 Years, <a href="#">CMS277v0</a> , Table 6B, Line 22	Yes	Yes. Even though these codes are not included in the specification (since this measure is no longer updated), these were allowed for 2021 and will continue to be allowed for 2022	No. Application of sealants is not acceptable in this way. These services cannot be conducted via telehealth.	Yes

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?	Do documented services performed by external providers (not paid for or performed by the health center) count in UDS Tables 6B and 7, Columns C or F (Numerator)?
Low Birth Weight, no eCQM, Table 7, Section A	Yes (for existing prenatal care patients seen post-delivery).	Yes (for existing prenatal care patients seen post-delivery).	Yes. Birth weights may be identified in this way.	Yes
Controlling High Blood Pressure, <a href="#">CMS165v10</a> Table 7, Section B	Yes	Yes	No. Patient self-report blood pressure is not acceptable in this way.	Yes. Blood pressure is to be performed, paid for, or approved by a health center provider or provider delegate and documented in the patient health record.
			Yes. Blood pressure through remote monitoring device only is acceptable in this way.	
Diabetes: Hemoglobin A1c (HbA1c) Poor Control (>9 percent), <a href="#">CMS122v10</a> Table 7, Section C	Yes	Yes	No. HbA1c lab test is not acceptable in this way. These services cannot be conducted via telehealth.	Yes. HbA1c is to be performed, paid for, or approved by a health center provider or provider delegate and documented in the patient health record.

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