NQF Rural Telehealth and Healthcare System Readiness Measurement Framework

On behalf of the Research and Training Center on Disability in Rural Communities (RTC: Rural), we appreciate the opportunity to provide formal comments regarding the Rural Telehealth and Healthcare System Readiness Measurement Framework. We received this call for comments through a contact at the Administration on Community Living, National Institute on Disability and Rehabilitation Research.

RTC: Rural has conducted disability research for over 30 years to increase the capacity of people with disabilities to engage in rural community living. People with disability are overrepresented in rural communities, and resources supporting them to access economic and community living opportunities are often lacking. Our work has led to the development of community development tools, health promotion programs, disability and employment policy, and support and education for providers who serve people with disabilities in rural communities across the nation. The following comments are based on this experience.

We sincerely appreciate NDF efforts to fully assess the impacts of telehealth in rural communities. In this light, we offer four considerations to improve the framework in the contexts of equity, access, and community infrastructure.

1. There appeared to be a lack of committee representation from key rural community and community living agencies or stakeholders. These might include national representatives from the Tribal Governments, Associations of Programs for Rural Independent Living (APRIL), Indian Health Services, rural Veterans Administration, Centers for Independent Living, Area Agencies on Aging, Aging and Disability Resource Centers, and Administration on Aging, as well as rural providers of: accessible transportation, vocational rehabilitation, special education, home and community-based service agencies, home health care agencies, and public health home visiting programs. Including these types of stakeholders at the table and during conceptualization of the framework would help inform how telehealth uniquely impacts rural individuals who are most vulnerable during health and environmental emergencies.

FEMA's Whole Community Approach reduces unanticipated issues during an emergency. It also does a better job reflecting the needs, opinions, and experiences of those receiving services. One strategy to achieving a more balanced group is to consider the proportional representation of key rural stakeholders. For instance, since 17% of rural community members have a disability, then this proportion should be reflected in the planning group. Proportional representation is a valuable strategy for ensuring equity throughout a process.

2. Measurement tools lacked specificity regarding user experiences related to accessibility. We were concerned that the gaps in measurement did not include a more concerted focus on individuals with disabilities. Accessible design criteria such as screen reader accessibility, video conferencing for ASL, plain language, non-text based interfaces (i.e. pictures), and clear direct support service roles for patients with intellectual or developmental disabilities would enhance understanding of how telehealth is serving the whole population equitably. We emphasize that planning for accessibility and inclusion of people with disability cannot be phased in later. It must be a part of the decision making in all phases of planning, development and evaluation. We highlight the following article that highlights some of these issues. As an aside, one of the primary authors would be a possible choice for inclusion in your panel (see point 1). https://healthlaw.org/telehealth-and-disability-challenges-and-opportunities-for-care/

3. Measures appear to target those receiving services, and don't fully assess those who do not. Although the framework acknowledges disparities in health and technology literacy, as well as other dimension of user experiences, is doesn't fully capture those who lack technology and would likely not be served in an emergency situation. Many groups experience a digital divide (i.e. inequal access to internet services). Individuals who have a disability, Black adults, people who live alone, live in poverty, have lower educational attainment, rural residents, and adults over age 60 typically report lower rates of internet access (Gallardo et al., 2020; Goggin et al., 2019; Tsetsi & Rains, 2017; Weiner & Puniello, 2014). For example, a recent study posted on NPR reported highlights that one-third of rural black southerners lacked internet access (see https://www.npr.org/2021/10/06/1043666017/internet-access-rural-black-southerners-digital-infrastructure-divide).

In consideration of these disparities, telehealth as a comprehensive strategy is premature. For example, while the FCC claims that 99% of the country is served by at least one provider offering fixed residential internet service, the data over-estimates coverage because an entire census block is defined as receiving services if at least one household has coverage. Census blocks are particularly large in rural parts of the U.S., where coverage is particularly uneven. One wonders how to capture the significant number of individuals who do not receive services due to inequal digital access—likely the most vulnerable populations during an emergency. While the digital divide is acknowledged as a measures gap in the report it would be helpful to highlight in more specificity the needs for improved data collection in defining broadband access in rural communities. For example, rural communities face barriers not only in the availability of broadband infrastructure but also in costs and quality.

4. Community level indicators are vital to understanding both the positive and negative impacts of emergency-driven telehealth. Building telehealth infrastructure has both benefits and risks to rural communities. While the framework highlights these benefits in terms of increased access to timely care and specialists, and decreased barriers in terms of transportation, it lacks significant inquiry into the risks of lost community capacity to serve people in-person. Not all people benefit from telehealth services in the same way, and in particular people with high-level needs rely on in-person care. Once local infrastructure is gutted, through competition introduced from telehealth, community level capacity to respond during and after emergencies is compromised. Rural health care providers play important roles in emergency response and recovery and can only fulfill those roles if they are in place in the community.

This lost capacity touches on many factors that are uniquely rural, such built trust with community members and local knowledge about available resources to leverage during an emergency. Local providers provide an important resource that cannot be replaced by telehealth in resource poor areas, including community linkages, responsiveness or flexibility, and employment. A more balanced assessment of this risk is warranted. Circling back to our initial recommendation, including the perspectives of rural community economic development stakeholders in the discussion is advised.

Thank you for the opportunity to comment on the NQF's recommendations.

Sincerely,

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AAHD - Dedicated to better health for people with disabilities through health promotion and wellness



October 8, 2021

Re: NQF Rural Telehealth and Healthcare System Readiness Measurement Framework

The American Association on Health and Disability and the Lakeshore Foundation submit our support for comments submitted by the University of Montana RTC – Rural Institute for Inclusive Communities.

The American Association on Health and Disability (AAHD) (www.aahd.us) is a national non-profit organization of public health professionals, both practitioners and academics, with a primary concern for persons with disabilities. The AAHD mission is to advance health promotion and wellness initiatives for persons with disabilities. AAHD is specifically dedicated to integrating public health and disability into the overall public health agenda.

The Lakeshore Foundation (www.lakeshore.org) mission is to enable people with physical disability and chronic health conditions to lead healthy, active, and independent lifestyles through physical activity, sport, recreation and research. Lakeshore is a U.S. Olympic and Paralympic Training Site; the UAB/Lakeshore Research Collaborative is a world-class research program in physical activity, health promotion and disability linking Lakeshore's programs with the University of Alabama, Birmingham's research expertise.

The University of Montana RTC submission addressed four considerations to improve the framework in the contexts of equity, access, and community infrastructure.

- 1. There appeared to be a lack of committee representation from key rural community and community living agencies or stakeholders. 17 % of rural community members have a disability and folks with disability experience from a rural perspective should be engaged with NQF panels on this topic.
- 2. Measurement tools lacked specificity regarding user experiences related to accessibility. Planning for accessibility and inclusion of people with disability cannot be phased in later, but should be a component of the planning and analysis work.
- 3. Measures appear to target those receiving services, and don't fully assess those who do not. Although the framework acknowledges disparities in health and technology literacy, as well as other dimensions of user experiences, it doesn't fully capture those who lack technology and would likely not be served in an emergency situation.
- 4. Community level indicators are vital to understanding both the positive and negative impacts of emergency-driven telehealth. While the framework highlights these benefits of telehealth in terms of increased access to timely care and specialists, and decreased barriers in terms of transportation, it lacks significant inquiry into the risks of lost community capacity to serve people in-person. A more balanced assessment of this risk is warranted.

Respectfully submitted, American Association on Health and Disability and Lakeshore Foundation

E. Clarke Ross, D.P.A. AAHD Public Policy Director Lakeshore Fd Washington Representative



Rural Telehealth and Healthcare System Readiness Measurement Framework

FINAL REPORT - DRAFT #2

September 15, 2021

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Executive Summary

Telehealth use significantly increased in 2020, spurred by changes in healthcare delivery due to the coronavirus 2019 (COVID-19) pandemic, expanded reimbursement, and other facilitating policies. While the shift to telehealth offers potential benefits, such as greater access to care for patients and reduced costs, measuring the quality of care provided via telehealth is critical. Standardized, comprehensive measurement of telehealth is needed to inform how to leverage it to enhance care delivery, increase access to care, and achieve positive health outcomes. This need is particularly important in rural America, which faces unique risks and barriers to achieving optimal health outcomes.

In this project funded by the Centers for Medicare & Medicaid Services (CMS), the National Quality Forum (NQF) convened a multistakeholder Committee to provide guidance on how to assess the impact that telehealth has on healthcare system readiness and health outcomes during emergencies such as pandemics, natural disasters, mass violence, and other public health events, specifically for rural areas. To inform the Committee's work, NQF conducted an environmental scan of peer-reviewed literature on how telehealth is being used in rural areas to deliver care during or for emergencies, the evolving telehealth policy and practice landscape, and quality measures related to telehealth and healthcare system readiness. Building on the environmental scan and the 2017 Telehealth Measurement Framework, this report puts forward a conceptual measurement framework to guide quality and performance improvement for care delivered via telehealth in rural areas in response to disasters.

The framework includes five domains:

Access to Care and Technology: the ability of telehealth to increase rural patients' access to certain types of healthcare during emergencies

Costs, Business Models, and Logistics: the costs of using telehealth, how it is supported financially, and delivery model implications

Experience: how interactions of patients/caregivers and care team members through telehealth meet their needs and preferences

Effectiveness: the desired outcomes, safety, and timeliness of care delivered via telehealth **Equity**: how telehealth can help support equal opportunities for all people to be healthy

Considerations for each domain are outlined along with rural-specific measurement issues and potential solutions (e.g., low-patient volumes, broadband access, role of local organizations in influencing health, and local resources). In using the framework, the Committee examined and selected 26 performance measures aligned with the five domains that should be prioritized for use to assess care delivered via telehealth in rural areas affected during emergencies and disasters. These measures focus on access to care and specialists, acute care needs, admissions and readmissions, behavioral health, care coordination, and patient experience. However, measure gaps exist in the priority areas identified in the framework. Several prioritized measure concepts are proposed that aim to fill these gaps. Specifically, measures are needed that address the digital divide, timeliness of care, telehealth care utilization during emergencies, adaptability and healthcare system readiness, health equity (e.g., focused on social determinants of health [SDOH], health literacy, and health disparities), and experience with telehealth. Furthermore, 10 recommendations summarize current priorities for evaluating rural telehealth during emergencies and underscore key areas for future measurement. This report is intended to help stakeholders identify which measures are available for use, encourage the development of new measures that address gaps, and promote the use of such measures to assess the impact of telehealth

on healthcare system readiness and health outcomes in rural areas affected by large-scale emergency events.

Introduction

Background

Telehealth includes healthcare services and health education provided via electronic and telecommunication technologies. For example, telehealth includes real-time phone or video conferencing, asynchronous care (e.g., via email), patient education, and remote patient monitoring. Telemedicine is a large component of telehealth in which medical care is delivered through video, phone, or asynchronous communication.

Telehealth has been available for many decades. Yet prior to the COVID-19 pandemic, telehealth was only offered in limited circumstances to address specific clinical issues (i.e., specialist availability), through consumer-based platforms and in integrated health systems. This was due to restrictions on telehealth reimbursement and the patchwork of state-level policies that limited the business model for telehealth. Limited broadband has also been an issue, in particular bringing telehealth to rural areas. However, since the start of the COVID-19 pandemic in March 2020, telehealth has grown substantially, filling vital gaps in care delivery caused by the stay-at-home and social distancing guidelines.^{3,4} The growth of telehealth has been fueled by changes in reimbursement and other policies that facilitated payment and delivery of care, ^{5,6} thus creating a viable business model for telehealth. Notably, the fate of these facilitating policies post-pandemic is uncertain. ⁷ Yet what is clear is that many of the novel use cases for telehealth developed during the pandemic will likely remain in place long-term. For example, during the pandemic, telehealth has been used to help triage and treat emergency department (ED) patients and for remote hospitalist coverage by health systems.

The value proposition of telehealth is to improve access to care by increasing communication channels among clinicians and between patients and clinicians. Telehealth can enhance quality of care, particularly when increased communication can improve treatment recommendations. Telehealth can also fill a gap in care delivery in which access is restricted by geography, specialist availability, or other barriers. Telehealth is particularly useful in bringing care to rural communities where barriers to accessing healthcare services are common⁸ and existed prior to the COVID-19 pandemic. For example, rural communities have reduced access to in-person services due to long travel times and fewer services available in general, particularly specialists. While telehealth holds promise in increasing access to rural areas, challenges include inadequate access to technology and limited broadband internet connections in some rural communities. Rural residents also have higher rates of chronic medical and mental health conditions, less access to health education, and poorer health literacy. ^{10,11} As a result, rural Americans have worse health outcomes than those living in nonrural areas. This has been termed the *rural mortality penalty*. ¹²

The rural mortality penalty is particularly prominent in time-sensitive emergencies, during public health emergencies, such as COVID-19, and disasters. Time-sensitive emergencies include stroke and trauma care, in which early access to specialists improves outcomes. Telestroke is an example of telehealth helping to solve the rural access issue to specialty care. It provides greater access to a stroke neurologist in rural EDs and improves physicians' ability to make critical, time-sensitive decisions for stroke, such as whether to use tissue plasminogen activator (tPA) and whether to transfer patients to higher-level care

for more advanced services, such as clot retrieval. Another example is tele-emergency, in which emergency physicians are available for remote, often rural hospitals for consultation regarding transfers to higher levels of care. 15

Despite the large expansion of telehealth in American healthcare, quality measurement for telehealth is in an early development phase. This is because quality measures have not kept up with telehealth delivery models, particularly those that developed and expanded recently during the COVID-19 pandemic. Telehealth quality measures have not been developed nor tailored to the needs of rural areas, for time-sensitive and public health emergencies, and for disasters. To measure the quality of care for rural telehealth, a measurement framework is needed to identify appropriate ways to assess quality as well as identify gaps for future measure development.

The goal of this project is to create a conceptual measurement framework for telehealth quality measurement in rural areas for time-sensitive emergencies and in response to public health emergencies, such as COVID-19, as well as disasters. The focus is to identify measures available for current use, as well as to encourage the development of new measures. This project builds on prior related NQF work. Prior work includes a quality measurement framework for telehealth (detailed in the 2017 Telehealth Framework Report) that described four domains for telehealth measurement:

Access to Care: how telehealth increases whether individuals can obtain clinical services and whether remote practices can deliver specialized services

Financial Impact or Cost: the cost burden on patients/family/caregivers and to clinicians and organizations to implement telehealth services

Experience: how patients perceive their telehealth, including the usability of telehealth services and the effect of telehealth on patients, care teams, and the community

Effectiveness: how the quality of telehealth care compares to the quality of in-person care. This domain also addresses the difference in patient outcomes when in-person services are unavailable, and care is provided via telehealth.

This project uses a similar approach to the 2017 Telehealth Framework Report but focuses on issues unique to rural areas as well as those that apply specifically to time-sensitive emergencies and disasters. In addition, the current project has an increased focus on equity, which was added as a separate domain. This project also integrates concepts from other related reports, including <u>ED transitions in care</u> (2017), <u>chief complaint-based measures</u> (2019), <u>trauma outcomes</u> (2019), and <u>healthcare system readiness</u> (2019).

Project Overview

In 2021, NQF convened a multistakeholder Committee to address rural telehealth and system readiness with funding from CMS. Nominations for the Committee were solicited through a public, 30-day nomination period, from which a list of proposed appointees was subject to a public commenting period. The 25-member Committee represents experts in rural healthcare delivery, telehealth research, telemedicine, healthcare policy, critical illness and disease management, health information technology (IT), and caregiver/patient advocacy (see Appendix A for a full list of Committee members).

NQF convened the Committee for five web meetings between January and July 2021, with one additional meeting to be held in October 2021. During these meetings, the Committee reviewed and provided feedback on the project's Environmental Scan Report titled Leveraging Quality Measurement

to Improve Rural Health, Telehealth, and Healthcare System Readiness, which included a review of current telehealth policies and practices, literature review, and scan of potentially relevant measures and measure concepts. The Committee used the content of the Environmental Scan Report to inform the discussion and development of a measurement framework as well as a list of existing measures and measure concepts relevant to rural telehealth and its impact on enhancing healthcare system readiness and outcomes.

Development of the Measurement Framework

Methodology

Measurement Framework

To develop the draft measurement framework, NQF began by adapting the domains and structure of the 2017 Telehealth Framework. The four domains from this framework (i.e., Access, Financial Impact/Cost, Experience, and Effectiveness) were used because they were developed recently and remain directly relevant to rural telehealth for time-sensitive emergencies and disasters, which is a subset of the earlier, more general framework.

From February 2021 through August 2021, NQF staff iterated on this initial draft framework based on the Committee's input shared via surveys and web meeting discussion. Suggestions from the Committee included additions to the list of considerations (e.g., referencing the importance of basic computer literacy and training; acknowledging the wider economic impact of telehealth on rural communities, such as availability of local hospital jobs or reduced risks for employers in rural areas) as well as larger structural changes (in particular, the inclusion of equity in the framework as well as incorporating rural-specific measurement issues throughout the framework instead of as a separate domain). NQF revised the draft framework based on this feedback to include these additional considerations suggested by the Committee, as well as modifying the structure of the proposed framework to incorporate equity as a domain and rural-specific measurement issues underpinning all four domains. These changes were integrated to create the final version of the measurement framework presented below.

List of Relevant Measures and Measure Concepts

In addition to developing the measurement framework, NQF and the Committee also developed a list of 26 measures and 43 measure concepts relevant for use with the final measurement framework. NQF performed an initial measure scan; the initial approach and overall characteristics of the measures identified in the measure scan are detailed in the Environmental Scan Report. In short, NQF identified 324 potentially relevant measures related to rural-relevant conditions, telehealth-relevant conditions, and healthcare system readiness.

From this list of 324 potentially relevant measures, NQF created an initial short list of 25 measures rated by NQF staff members as most directly related to telehealth in rural areas during emergencies based on literature review and prior Committee input. This list of measures addressed a mix of cross-cutting topics (e.g., access to care, care coordination, and patient experience) as well as some additional condition-specific topics (e.g., measures on substance use). NQF also created a supplemental list of 82 measures rated by NQF staff members as less directly related to telehealth. Lastly, NQF created a list of 46 rural-relevant, telehealth-relevant, and system readiness-relevant measure concepts; these were drawn from over 350 measure concepts previously identified during the 2017 Telehealth Framework

and the 2019 Healthcare System Readiness Framework projects. This short list of 25 directly related measures, 82 indirectly related measures, and 46 measure concepts was circulated with the Committee for feedback via an online survey. NQF sought input on the importance and feasibility of the 25 measures included in the short list, as well as recommendations for the most important, indirectly related measures and measure concepts to incorporate into the final list of measures and measure concepts. NQF also asked the Committee for input on measurement gaps.

Seven Committee members provided responses to the online survey, with three members providing additional written feedback via email. The feedback comprised suggestions to diversify the topics included in the measure short list and to include additional measures on mental health and depression, unplanned admissions and readmissions, medication management and side effects, transfer of information and care plans, and other topics. Based on this feedback, as well as discussion during web meetings, NQF removed eight measures from the 25-measure short list with the lowest-importance ratings. This included measures on patient experience, heart failure, weight assessment and counseling, and appropriate testing and antibiotic treatment for respiratory infections. NQF also included additional measures addressing access to care, care coordination, admissions and readmissions, acute care, and patient experience in the final list of relevant measures (<u>Appendix B</u>). NQF also compiled the suggestions for high-priority measure concepts and gaps to create the final list of measure concepts (<u>Appendix C</u>).

Framework

Intended Use

The Committee developed both a framework and a list of related measures and measure concepts that can be used to measure the quality of telehealth in rural areas during time-sensitive emergencies, public health emergencies, and disasters. Quality measures include measures of structure, process, and health outcomes, all related to telehealth. The framework and measures can be used to guide quality improvement efforts, as well as inform the development of new measures in gap areas. If the measurement framework is used for accountability purposes, additional context, including duration, region, and type of emergency, should be considered.

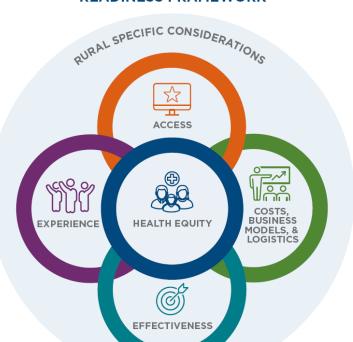
The measures in this framework emphasize access and ease-of-use of telehealth services (i.e., assessing the difference between telehealth care and no care), as well as the outcomes of telehealth services. Measures can also be stratified to assess disparities between groups to assess equity of care. These measures can be used to compare differences between in-person and telehealth care and/or differences between different telehealth modalities (e.g., real time versus asynchronous, video versus phone visits). However, the Committee shared that these differences may not be as relevant in the emergency context as access itself. Lastly, while the measures in this framework are focused on care during immediate emergencies, NQF and the Committee acknowledge that the nature of the emergency affects the measures that should be tracked. During short-term emergencies or disasters, acute care measures should be the focus; nonetheless, during an extended emergency, such as the COVID-19 pandemic, complex and chronic care measures (e.g., long-term prevention and wellness visits for patients with diabetes, cancer, chronic pain, and chronic obstructive pulmonary disease) also become relevant.

Overview of Measurement Framework

The final framework developed by the Committee includes five domains: (1) Access to Care and Technology; (2) Costs, Business Models, and Logistics; (3) Experience; (4) Effectiveness; and (5) Equity

(Figure 1). The Committee also identified a list of rural-specific measurement considerations and noted that the equity and rural health considerations "cut across" the other four domains. The domains and considerations specific to each domain are included below (Table 1).

Figure 1. Rural Telehealth and Healthcare System Readiness Measurement Framework



RURAL TELEHEALTH AND HEALTHCARE SYSTEM READINESS FRAMEWORK

Table 1. Domain-Specific Considerations Within the Rural Telehealth and Healthcare System Readiness Framework

Domain	Considerations
Access to Care and Technology	Clinical use cases: disaster-specific care, time-sensitive emergencies (e.g., stroke), access to primary/specialty care Geographic distance/travel Telehealth technology/capacity for communication (e.g., provider and patient access to devices that allow for participation in video or audio telehealth visits) Broadband issues affect telehealth access and modality (phone versus video) Basic computer literacy and training for patients and clinicians System-wide coordination, including interoperable technology and local resources

Domain	Considerations
Costs, Business	Cost to patients, caregivers, and insurers
Models, and Logistics	Adaptability and system readiness
	Business sustainability, spillover effects of telehealth
	(e.g., transfers, staffing)
	Technology costs, logistics of launch, and existing partnerships
	Wider financial impacts on the community (e.g., jobs, absenteeism)
Experience	Patient experience with telehealth (e.g., need to learn multiple
	platforms, acceptability, and trust of technology)
	Caregiver experience with telehealth
	Clinician experience with telehealth (e.g., comfort with platforms, ability
	to get assistance and advice from trustworthy sources during an
	emergency)
	Patient choice (option to receive remote versus in-person services)
	Patient trust of health system and telehealth technology
Effectiveness	Quality of care for clinical issues addressable through telehealth, other
	emergencies, and gaps in care that telehealth can address
	Planning around clinical issues not addressable through telehealth
	Time to care delivery, receipt of specific care
	Specific care needs of rural patients
Equity	How quality of care and outcomes differ by the intersection of factors,
	including, but not limited to, age, race, gender identity, disability,
	socioeconomic status (SES), language, and literacy
	Social determinants of health (SDOH) (e.g., access to primary care,
	transportation, and food insecurity)
	Impact on telehealth on existing inequities

Each of these domains and associated considerations are described in further detail below.

Access to Care and Technology

The first domain of the measurement framework addresses access to care and technology. Topics in this domain relate to the ability of telehealth to increase rural patients' access to certain types of healthcare during emergencies, as well as the barriers that may prevent rural patients from using telehealth to its greatest potential.

The Committee developed the following list of considerations related to this domain:

Clinical use cases. Telehealth may be able to address a range of clinical use cases for rural communities, including disaster-specific care (e.g., triaging potential COVID-19 patients), timesensitive emergencies (e.g., telestroke services), and access to ongoing primary and specialty care (e.g., wellness visits). However, telehealth cannot replace all in-person services (e.g., administering immunizations).

Geographic distance and travel. Telehealth may reduce barriers to access care due to long distances from healthcare facilities and lack of transportation.

Telehealth technology and capacity for communication. Telehealth capacity may be limited by provider and patient access to software and hardware that allows for participation in telehealth

visits (e.g., access to a video-enabled device with capacity to run a Health Insurance Portability and Accountability Act [HIPAA]-compliant platform).

Broadband issues. Video visits may be challenging in some areas due to limited broadband access; in these areas, audio-only visits may be a feasible option for telehealth services. Text interventions may also be able to play a role in supporting healthcare services. Advances in internet infrastructure (e.g., satellite internet) may expand broadband internet access in rural areas. Local institutions (e.g., libraries) may also serve as community hubs that can provide broadband service in a central location.

Basic computer literacy and training. Both patients and providers should have basic computer literacy to participate in telehealth visits. Computer literacy training programs may be helpful in this area. For some patients who are not comfortable with technology, it may be helpful to connect them with a caregiver who can provide technical assistance to use telehealth visits.

System-wide coordination. Different providers must have access to interoperable technology and information to enable coordinated patient care. Patients may also receive care through multiple types of systems (e.g., some pediatric chronic care is conducted through the school system); health records should be shared between these different systems, which will provide health professionals with the information needed for effective care. Health information exchanges (HIEs) can be an important resource if telehealth records are integrated into an institution's electronic health records (EHRs). Telehealth providers should also be able to connect patients with in-person local resources (e.g., emergency medical services) for immediate assistance.

Costs, Business Models, and Logistics

The second domain addresses costs, business models, and logistics. This domain involves what the costs are in order to implement telehealth delivery (costs), how telehealth delivery is supported from a financial perspective in both the short- and long-term (business models), and how clinicians and organizations implement telehealth delivery models (logistics).

The Committee developed the following list of considerations related to this domain:

Costs to patients, caregivers, and insurers. There may be out-of-pocket costs to patients for using telehealth services. Consideration was given to limit out-of-pocket costs to patients by insurance companies during the COVID-19 pandemic. In addition, costs of telehealth should also count towards deductibles, particularly in high-deductible health plans.

Adaptability and system readiness. There was discussion about the importance of adaptability (i.e., the ability to change and scale up the delivery of services during an emergency, including provider attitudes and openness to using telehealth) and readiness (i.e., availability of equipment, telehealth systems, training, etc., prior to an emergency) during extended emergencies. The Committee did not have any immediate suggestions for measures related to adaptability, but NQF staff shared that general measures of chronic disease, access to care, and healthcare system readiness could be repurposed to focus on telehealth. Alternatively, interprofessional tools that assess the quality of teamwork within an organization could be adapted for telehealth. In addition, the role of direct-to-consumer (DTC) models purchased by employers is uncertain because visits are sometimes invisible to longitudinal primary care physicians (PCPs) and may not consider overall care plans. Nonetheless, there was increased use of DTC platforms during the COVID-19 pandemic that increased access for rural communities.

Business sustainability and spillover effects of telehealth (e.g., transfers, staffing). One of the limitations in a health system's willingness to invest in telehealth during the COVID-19 pandemic was the uncertain, future regulatory environment in the long term. This is particularly important for rural clinicians and organizations that have limited access to capital and resources. However, regulatory flexibility during the public health emergency, particularly the temporary relaxation on enforcing HIPAA during COVID-19, was a major facilitator of telehealth implementation.

Technology costs, logistics of launch, and existing partnerships. Implementation of telehealth programs can be costly for caregivers and organizations. Launching a telehealth program can also be logistically difficult. For example, training clinicians on new telehealth platforms and ensuring that telehealth visits are staffed appropriately is a complex process. During a public health emergency such as COVID-19, rolling out telehealth was facilitated in health systems in which an infrastructure existed pre-pandemic. By comparison, health systems that had not previously developed telehealth infrastructure had a considerably harder time launching telehealth services, especially early in the pandemic when stay-at-home orders necessitated rapid telehealth deployment to maintain business operations and care continuity. One logistical hurdle during the COVID-19 pandemic was the slow process of hospital credentialing of clinicians. This might have been facilitated with a centralized credentialing platform across health systems. Alternatively, regulatory, or legislative solutions could facilitate hospital credentialing for telehealth services during a public health emergency, such as COVID-19. Another logistical barrier to telehealth care is that it can be difficult to track telehealth use in HIEs. Poor interoperability of telehealth data may create barriers to continuity of care and care coordination. A solution to this would be common, interoperable health IT, which would make it easier and less expensive for rural providers to adopt and maintain health IT to support telehealth visits. A national strategy that would require interoperable health IT during emergencies and that is ready to scale could save time and money during an emergency such as COVID-19. Additionally, interstate licensure has been a barrier to the implementation of telehealth historically. Rules were loosened during the pandemic to facilitate telehealth implementation. A federal program for physician licensure or greater use of interstate licensure compacts long term could facilitate telehealth implementation. The Committee also discussed that for pediatric care, many children receive some of their chronic care assistance through schools. Therefore, any discussion of telehealth for chronic care needs should consider the different systems that interact in providing chronic care and how telehealth is handled by each of these systems.

Wider financial impacts on the community. Telehealth implementation can be costly to health systems. Implementing telehealth can have an impact on the business operations of local clinicians who work in rural areas. Therefore, costs of implementation should be considered through a wider lens and account for the wider financial impact on the community. In particular, funneling telehealth visits into a centralized system could harm local clinicians financially and potentially disrupt long-term local care availability if those clinicians are unable to remain financially solvent. When possible, including local clinicians in telehealth that affects their patients is one way to prevent this situation from occurring. Another consideration is to ensure that telehealth services do not systematically draw patients out of rural areas for ancillary services, such as laboratory testing or radiology.

Experience

The Experience domain includes the interactions of patients, caregivers, and care team members with telehealth. It aims to assess the extent to which individuals' interactions with telehealth reflect their needs and preferences.

Patient choice. The option for patients to receive care remotely versus in person is a key consideration of this domain. It will be important to assess whether receiving care via telehealth is preferred by patients and for which types of appointments, conditions, or symptoms. Telehealth services may provide a greater opportunity to maintain their privacy while receiving care (e.g., allowing patients to receive behavioral health counseling from someone outside of their community).

Patient acceptability, trust of technology, and receiving care virtually. Some patients, especially those in vulnerable populations, may not be comfortable with new technology platforms or devices, or they may have concerns about their privacy and security. Lack of consistency across platforms (e.g., if patients must navigate several platforms to visit different providers) may also negatively affect patient experience. Beyond the technology, telehealth measurement may consider whether patients trust the healthcare system when interacting with the care team virtually (e.g., "Do you have a comfortable relationship with your doctor?"). While many patients and caregivers successfully adapted to telehealth appointments during the COVID-19 pandemic, others may have had a substandard experience with telehealth given the fast pivot, which might affect their willingness to use telehealth services in the future. Providing resources on how to use telehealth, sharing guidance to support patients' digital literacy and comfort level, and connecting patients with dedicated care team members who can assist with technical barriers are strategies that may improve patients' experience. Feedback from patients on their experience with telehealth can also provide valuable information on opportunities for improvement.

Clinician and care team experience. The experience of providers and the care team is another key aspect of this domain. Ideally during emergencies, providers would already be familiar with telehealth systems and learn to use them ahead of disasters. Training exercises may improve providers' comfort with using telehealth during emergencies, as well as establishing expectations for patient-centered care delivery. Telehealth may also allow providers to acquire assistance and advice from trustworthy sources in a timely manner during emergencies.

Effectiveness

The Effectiveness domain of the measurement framework addresses the quality and efficiency of care provided via telehealth. This encompasses measurement to ensure that care is effective, safe, and timely regardless of the delivery method. Note that while measures of effectiveness can facilitate comparisons between the same services rendered via telehealth versus in-person care, telehealth may also provide services that would be otherwise unavailable in an emergency situation. In this case, effectiveness measures are useful for understanding the quality of care being provided, with the caveat that performance data from telehealth visits during emergencies may not be directly comparable with performance data from in-person visits.

The Committee developed the following list of considerations related to this domain:

Quality of care for clinical issues addressable through telehealth, other emergencies, and gaps in care that telehealth can address. Telehealth is an alternative method of delivering healthcare; nevertheless, the standard of care should be similar for both in-person and telehealth care. For clinical issues that are appropriate to treat with telehealth (e.g., behavioral health evaluations and diagnoses), the quality of care and the outcomes for patients should be similar across in-person and telehealth care.

Planning for clinical issues not addressable through telehealth. There are certain aspects of care that telehealth cannot address (e.g., administering vaccinations). Telehealth providers and systems should account for these clinical issues and should connect patients to local providers for these services.

Time to care delivery and receipt of specific care. Telehealth may increase patients' access to providers, especially specialists. This can reduce the time to care delivery for time-sensitive services, such as substance use disorder (SUD) treatment, thus drastically improving patient outcomes.

Specific care needs of rural patients. Rural patients are at higher risk for medical-, mental health-, and substance use-related conditions. They may also be isolated from their regular clinicians by geography and have less access to specialty care, as they commonly rely on local clinicians for their care. Telehealth may help meet these needs more effectively by improving access to care through remote connection, as well as involving specialists or care teams for more complex cases.

Equity

The final domain of the measurement framework is Equity. Health equity is a goal shared across the healthcare system to provide optimal care to all Americans. Items in this framework domain include the identification of disparities in access to care and outcomes.

The Committee developed the following list of considerations related to this domain:

How quality of care and outcomes differ by the intersection of factors. Quality of care may vary based on a combination of factors, including, but not limited to, age, race, gender identity, disability (including physical, developmental, and intellectual disabilities), SES, language and communication barriers (including visual and hearing impairments as well as first language), geographical location, and literacy. As with in-person care, telehealth care should be assessed for these disparities and the information used to inform quality improvement efforts towards culturally appropriate care. By increasing the provider network available to rural patients, telehealth may also increase the availability of culturally sensitive care (e.g., easier access to a bilingual provider). It may be helpful to report measures along with demographic data (e.g., race and ethnicity) to understand whether care delivery is achieving equitable outcomes.

Social determinants of health (SDOH). The U.S. Department of Health and Human Services (HHS) defines SDOH as "the conditions in the environments where people are born, live, learn, work, play, worship, and age that affect a wide range of health, functioning, and quality-of-life outcomes and risks." Telehealth services may mitigate some of the impacts of SDOH on access to care and outcomes (e.g., providing opportunities to receive care despite unreliable transportation). For patients who receive telehealth services in their homes, providers may also have additional insight into their housing and social/community context; providers can screen for patients' needs related to SDOH and can address these needs to inform better care. It may be helpful for telehealth providers to work with the care coordination team (e.g., social workers) to refer patients to local assistance programs (e.g., food banks) when appropriate.

Impact on telehealth on existing inequities. Increased provision of telehealth services may be able to help reduce disparities (e.g., increasing access to care for patients located in remote locations), but it may also worsen disparities depending on implementation and resource availability (e.g., leaving patients unable to afford internet-enabled devices with low access to care).

Rural-Specific Measurement Considerations

The Committee identified a list of rural-specific considerations that affect in-person care, telehealth delivery, and quality measurement across rural areas. These considerations are not specific to an individual domain of the framework but are pertinent across all domains. For example, increased broadband access directly relates to the Access to Care and Technology domain, but it also affects the other domains: Costs, Business Models, and Logistics (e.g., increased broadband infrastructure could reduce the costs to set up reliable technological systems for telehealth), Experience (e.g., patients may have more positive experiences with telehealth when the internet connection allows for video visits), Effectiveness (e.g., increased broadband may enable more timely telehealth visits to behavioral health specialists), and Equity (e.g., low-cost broadband could help increase access to care for disadvantaged populations).

These considerations should not only be seen as a list of challenges, but also as promising opportunities for improving healthcare delivery in rural areas. Improvement in these areas may be driven by a variety of stakeholders, including local champions of telehealth implementation and other stakeholders outside of the traditional medical system (e.g., volunteer fire departments and local organizations, such as churches and libraries).

Table 2. Rural-Specific Considerations Affecting Measurement of Telehealth and System Readiness

Challenge	Description	Potential solution(s)
Low patient volumes	Reduces measurement reliability and ability to risk-adjust at the clinician level	Aggregate data across larger areas (e.g., state) to improve reliability
Economic strain limits investment	Ability of rural providers to invest in telehealth is limited, particularly without guarantees of long-term return on investment given policy uncertainty	Provide rural-specific grants or other resources to support telehealth in rural areas; increase funding to rural providers for delivering telehealth services ¹⁸
Limited broadband access	Limited rural coverage allows for fewer residents to receive telehealth in their homes and limits the capacities of providers, including emergency services	Create incentives for broadband providers to develop networks in rural areas, particularly in Native American reservations ¹⁹
Telehealth may reduce in-person access	An unintended consequence of increased telehealth use may be reduced in-person care availability in rural areas as providers centralize and shift to telehealth	Ensure and/or require that local rural providers and community members be included in plans to deliver telehealth services to local populations; monitor the impact of telehealth on local rural service providers

Challenge	Description	Potential solution(s)
Paucity of local in-	If in-person care is	Develop pathways to definitive care
person resources	recommended following a	through additional telehealth
	telehealth visit, availability may	resources (i.e., specialists); provide
	be limited due to provider	incentives or grants for the
	shortages; rural communities	implementation of telehealth
	and facilities may also face	technology in rural areas across
	difficulties recruiting workforce	physician and nonphysician services
	to implement and maintain	
	telehealth technology	
Rural readiness issues	Rural areas have limited	Ensure that rural areas participate in
	resources for both healthcare	regional healthcare coalitions in
	and nonhealthcare	partnership with groups in
	readiness (i.e., equipment and	metropolitan areas that may be able
	human capital) required to	to share/contribute resources during
	respond to a public	a public health emergency
	health emergency	
Informal	Rural areas may have more	Ensure and/or require that local
communication among	informal networks of	providers and community members
provider networks	communication, which are not	be included in rural telehealth
	fully reflected in formal patient	services and programs
	records and referrals, thus	
	making it difficult to integrate	
	telehealth and implement	
	telehealth programs uniformly	
Role of	Local organizations (e.g.,	Encourage telehealth programs to
local organizations	churches, libraries) have an	engage with local organizations to
	important impact on healthcare	provide increased access to care for
	delivery in some rural	rural residents
	communities; the influence of	
	these organizations may not be	
	accounted for in traditional	
	measurement systems	

Relevant Measures

Overall Characteristics

NQF and the Committee created a final list of 26 measures that are potentially useful for understanding aspects of quality represented in the framework. These measures can be used to assess aspects of performance related to four of the framework domains (i.e., Access to Care and Technology; Costs, Business Models, and Logistics; Experience; and Effectiveness). The list of measures includes 13 outcome measures (50 percent), including four patient-reported outcome performance measures (PRO-PMs) (15 percent) and 13 process measures (50 percent). Ten of the 26 measures are currently NQF-endorsed (38 percent), five have lost NQF endorsement (19 percent), and 11 are not endorsed (42 percent). Lastly, 23 of the measures (88 percent) are currently active in CMS quality reporting programs.

The measures address a variety of topics and clinical conditions, including access to chronic and acute care, admissions and readmissions, care coordination, and patient experience. Highlights include the following:

Two measures on access to care and access to specialists were selected based on the importance of assessing changes in access to specific services during emergencies in rural areas due to the use of telehealth.

Three measures addressing telehealth-appropriate acute care are included to monitor access and quality of crucial, specialty, or time-sensitive care required during emergencies.

Five admissions and three readmissions measures are included to assess how telehealth affects the overall quality of care and care coordination post-discharge.

Five behavioral health measures are prioritized as rural patients, who are at elevated risk for conditions such as depression or substance use. These conditions may be exacerbated during emergencies.

Seven care coordination measures, focused on topics such as follow-up, medication reconciliation, and care plan measures, are included. Telehealth may improve access to follow-up care and fill other gaps in care during emergencies.

One patient experience measure is included. Using a survey-based assessment of access and experience with technology can inform improvements in telehealth implementation and delivery.

The specific measures relevant to each domain are listed below. Measures relevant to multiple domains are listed more than once (e.g., CMS Measures Inventory Tool [CMIT] 3501: Transfer of Health Information to the Patient Post-Acute Care is relevant to both access and effectiveness and is listed in both sections.) Committee members also noted the following caveats and potential unintended consequences:

Quality measures that address more general topic areas (e.g., all-cause readmissions) rather than specific conditions are more likely to avoid low case-volume measurement challenges in rural areas. However, condition-specific measures are more likely to capture the effect of telehealth (e.g., stroke-specific measures can help measure the impact on patient outcomes after establishing a telestroke program). Both general and condition-specific measures have been included in this list of potentially relevant measures.

Both primary and secondary health effects result from an emergency (e.g., hospitalizations might increase immediately after a natural disaster due to direct injuries; later, hospitalizations increase due to chronic conditions that went untreated due to lack of access to primary care following the disaster). This distinction between primary and secondary health effects should be considered when interpreting changes in measure performance over time; primary effects may be unavoidable, but secondary effects can be mitigated by an adaptable and well-prepared healthcare system. Committee members noted that these considerations are especially relevant to admissions/readmissions and behavioral health measures.

While the list of potentially relevant measures includes clinician-, facility-, and health plan-level measures, it may also be helpful for stakeholders to supplement these measures with population-level measures of mortality, overdoses, suicide rates, etc., in order to identify disparities in care across larger geographic regions.

Readmissions measures act as a proxy for failures of outpatient care and poor discharge planning. Committee members noted that these measures do not capture all possible failures of care (e.g., being placed under observation), but they can still provide general insight into patient outcomes over time.

Admissions and readmissions measures may be difficult to interpret during emergencies and should be used alongside other measures for context. For example, reduced admissions during an emergency could be undesirable (e.g., patients are avoiding the healthcare system due to fear of infection), and increased admissions could indicate good care (e.g., a local healthcare facility is closed, so the next-nearest hospital admits a larger number of patients).

Care coordination may be limited by resources during emergencies (e.g., if internet is no longer available, data cannot be transferred electronically). However, the importance of care coordination is heightened with the use of telehealth (which can inadvertently disrupt regular care processes) and during emergencies (in which care from temporary healthcare providers can be lost entirely if it is not recorded and communicated properly). Committee members encouraged tracking care coordination measures over time and using the next best available technology (e.g., audio calls) during emergencies.

Access to Care and Technology Measures

Category	NQF ID	Endorsement Status	Measure	Notes
Access	N/A	Not Endorsed	Access to Care (Agency for Healthcare Research and Quality)	
	N/A	Not Endorsed	Access to Specialists (Agency for Healthcare Research and Quality)	
Admissions	0272	Endorsement Removed	Diabetes Short-Term Complications Admission Rate (PQI01-AD)	Developer could no longer support maintenance.
	0275	Endorsement Removed	Chronic Obstructive Pulmonary Disease (COPD) or Asthma in Older Adults Admission Rate (PQI05-AD)	Developer could no longer support maintenance.
	0277	Endorsement Removed	Heart Failure Admission Rate (PQI08-AD)	Developer could no longer support maintenance.
	2888	Endorsed	All-Cause Unplanned Admissions for Patients With Multiple Chronic Conditions	
Behavioral Health	0004	Endorsed	Initiation and Engagement of Alcohol and Other Drug Dependence Treatment	
	0418 / 0418e	Endorsement Removed	Preventive Care and Screening: Screening for Depression and Follow-Up Plan	Developer did not resubmit this measure for endorsement but plans to maintain this measure independently.
	0576	Endorsed	Follow-Up After Hospitalization for Mental Illness	
	2152	Endorsed	Preventive Care and Screening: Unhealthy Alcohol Use: Screening & Brief Counseling	
Coordination	0006	Endorsed	Care Coordination (Centers for Medicare & Medicaid Services)	
	0097	Endorsed	Medication Reconciliation Post-Discharge	
	0326	Endorsed	Advance Care Plan	
	N/A	Not Endorsed	Drug Regimen Review Conducted With Follow-Up for Identified Issues PAC IRF QRP	
	N/A	Not Endorsed	Closing the Referral Loop: Receipt of Specialist Report	
	N/A	Not Endorsed	Transfer of Health Information to the Patient Post-Acute Care (PAC)	

Category	NQF ID	Endorsement Status	Measure	Notes
	N/A	Not Endorsed	Transfer of Health Information to the Provider	
			Post-Acute Care (PAC)	

Costs, Business Models, and Logistics Measures

The environmental scan did not identify any relevant measures related to costs and business models. During the discussion, NQF and the Committee did consider several measures related to logistics. These included structural measures, such as NQF #0497 Admit Decision Time to ED Departure Time for Admitted Patients and N/A: Median Time From Emergency Department Arrival to Time of Departure From the Emergency Room for Patients Admitted to the Hospital. However, the Committee suggested that more general measures related to time-to-consult would be more relevant for rural healthcare facilities during emergencies. These specific concepts are described in further detail in the Measurement Gap Areas and Measure Concepts section.

Experience Measures

Category	NQF ID	Endorsement Status	Measure	Notes
Coordination	<u>0006</u>	Endorsed	Care Coordination (Centers for Medicare & Medicaid Services)	
Experience	N/A	Not Endorsed	CAHPS Health Information Technology Item Set	The Committee also recognizes that the Clinician & Group Visit CAHPS survey (4.0) is being modified to refer to the most recent visit whether in-person, by phone, or by video. These changes were made in order to be responsive to the increased use of telehealth as a result of COVID-19. While the survey is still in beta testing, the updated CAHPS survey may be a useful addition related to assessing patient experience in the future.

Effectiveness Measures

Category	NQF ID	Endorsement Status	Measure	Notes
Acute	N/A	Not Endorsed	Endorsed Median Admit Decision Time to ED Departure	
			Time for Admitted Patients (eCQM)	
	N/A	Not Endorsed	ed Hospital 30-Day, All-Cause, Risk-Standardized	
			Mortality Rate Following Acute Ischemic Stroke	

Category	NQF ID	Endorsement Status	Measure	Notes
	N/A	Not Endorsed	Emergent Care for Improper Medication	
			Administration, Medication Side Effects	
Admissions	<u>3490</u>	Endorsed	Admissions and Emergency Department (ED)	
			Visits for Patients Receiving Outpatient	
			Chemotherapy	
Behavioral	<u>3175</u>	Endorsed	Continuity of Pharmacotherapy for Opioid Use	
Health			Disorder (OUD)	
Coordination	0006	Endorsed	Care Coordination (Centers for Medicare &	
			Medicaid Services)	
	<u>0097</u>	Endorsed	Medication Reconciliation Post-Discharge	
	N/A	Not Endorsed	Drug Regimen Review Conducted With Follow-Up	
			for Identified Issues PAC IRF QRP	
	N/A	Not Endorsed	Transfer of Health Information to the Patient	
			Post-Acute Care (PAC)	
	N/A	Not Endorsed	Transfer of Health Information to the Provider	
			Post-Acute Care (PAC)	
Readmission	<u>1768</u>	Endorsement Removed	Plan All-Cause Readmissions	Withdrawn by developer.
	<u>1789</u>	Endorsed	Risk-Standardized, All Condition Readmission	
	N/A	Not Endorsed	Potentially Preventable 30-Day Post-Discharge	
			Readmission Measure (Claims Based)	

Equity Measures

During the environmental scan and subsequent discussion, NQF and the Committee did not identify any relevant, fully developed measures directly linked to equity (e.g., no direct measures of SDOH or direct measures of outcomes for a specific demographic group), although at least one SDOH measure is in development (CyncHealth's <u>transportation measure</u>). Several of the measures included in the list of framework-relevant measures are risk-adjusted (e.g., NQF #2888, #3490, #1768, and #1789), which adjusts for differences in performance but does not directly address the reasons for differences in performance.

It may be useful to stratify the measures included in this list to identify differences in performance and inform quality improvement efforts to increase equity. Stakeholders may also consider additional measurement in areas in which disparities are already known to exist or adapting existing measures.

Additional Considerations

In addition to the 26 measures included above, additional measures may be useful to consider. For example, the following six measures may be useful to assess patient treatment and outcomes for chronic conditions in rural areas in the context of an extended emergency.

Category	NQF ID	Endorsement Status	Measure	Notes
Chronic Care 0018 Endorsed Controlling High Blo		Controlling High Blood Pressure		
	0059	Endorsed	Comprehensive Diabetes Care: Hemoglobin A1C	
			(HbA1c) Poor Control (>9.0%)	
	<u>0575</u>	Endorsed	Comprehensive Diabetes Care: Hemoglobin A1c	
			(HbA1c) Control (<8.0%)	
	2079	Endorsed	HIV Medical Visit Frequency	
	2082	Endorsed	HIV Viral Load Suppression (HVL-AD)	
	N/A	Not Endorsed	Preventive Care and Screening: Screening for	
			High Blood Pressure and Follow-Up Documented	

Measurement Gap Areas and Measure Concepts

This work identified gaps for measures that should be developed to ensure the existence of efficient and effective measurement systems for rural telehealth and healthcare system readiness. The Committee identified measurement gaps in the following topic areas:

The digital divide (e.g., access to broadband internet and/or devices that support telehealth visits, comfort with the use of different types of technology, and reliable performance of technology, access to digital technology devices [e.g., shared versus personal computers and mobile devices])

SDOH, (e.g., health literacy, language preference, transportation access)

The quality of processes and outcomes associated with telehealth delivery

The amount of time taken from request to medical consultation

The patient experience with telehealth (e.g., access to a confidential space during telehealth visits)

The amount of telehealth services used by patients and clinicians during a disaster or emergency (e.g., volume of visits)

Adaptability and system readiness, including the time and ability to scale up capacity during disasters, and participation in regular readiness drills/exercises

Telehealth technology interoperability (i.e., exchange of data and information between providers and specialists)

The Committee also reviewed measure concepts from the 2017 Telehealth Framework and the 2019 Healthcare System Readiness Framework to identify the concepts most relevant to rural areas during emergencies. A total of 43 relevant measure concepts were identified by the Committee, including 32 measure concepts from the 2017 and 2019 Telehealth and Healthcare System Readiness reports and 12 additional measure concepts. The full list of these measure concepts is included in <u>Appendix C</u>, with additional information on the relevant framework domain as well as an example of a measure that might help to address the concept. If developed into fully specified measures, these measure concepts could potentially help fill some of the gap areas previously described.

The Committee identified 14 measure concepts as the most important measure concepts to prioritize for measure development. The table below lists the measure concepts in order of importance, as well as points of discussion relevant to each concept.

Table 3. Measure Concepts Most Relevant to Rural Telehealth and Healthcare System Readiness Framework

Measure Concept	Relevant Framework Domains	Notes
Availability of reliable broadband for patients and providers to participate in telehealth visits	Access to Care	Broadband access is limited in rural areas despite the availability of funding. Broadband enables patients and providers to participate in video visits. For patients without broadband access in their homes, community resources (e.g., libraries or community centers with internet) may be a gateway for telehealth visits.
Removing geographic limitations increased the volume of specialty providers	Access to Care; Experience; Effectiveness	In-person access to specialists is limited in rural areas; nonetheless, telehealth allows patients to connect with many providers across the country.
Able to provide care without admission into the emergency room (ER)	Access to Care; Logistics	Increased access to trained and licensed medical care professionals and specialists through telehealth can prevent use of the emergency department (ED) for nonemergent care. Increased access to care through telehealth can also treat chronic conditions before they develop into emergencies.
Reduction in diagnostic errors and avoidance of an adverse outcome because of telehealth	Logistics; Experience; Effectiveness	Telehealth visits may facilitate a smoother diagnosis process or lead to earlier diagnosis of conditions due to increased access to care. However, telehealth visits could lead to increased diagnostic errors due to less extensive physical examination or reduced capture of incidental findings from other testing.
The healthcare system was able to effectively provide the care that was recommended during a natural disaster and/or emergency because of telehealth Satisfactory visit for	Effectiveness Experience	Depending on interoperability and consistency between different systems, telehealth may increase the transfer of information between different providers and enable more effective care for patients. The telehealth system should be able to connect patients with any medication and/or equipment needed as part of care for their condition. Patients and providers may be more satisfied with
both the patient and provider	Experience	telehealth visits because of factors including convenience and cost-effectiveness. However, telehealth visits may be unsatisfactory due to factors such as limited proficiency or frustration with technology on both the user and provider sides.

Measure Concept	Relevant Framework Domains	Notes
Travel was eliminated or reduced for a specific patient encounter because of telehealth services	Access to Care; Logistics; Experience	Reduced restrictions on originating sites, increased participation of providers in telehealth platforms, etc., may increase the availability of telehealth for patients directly from their homes. This can eliminate rural patients' extended travel to visit providers in person.
Creation, resourcing, and active practice of plans to create additional surge capacity in hospital and nonhospital settings	Logistics	For providers and systems to be able to scale up telehealth programs and create surge capacity during emergencies, a baseline telehealth program and a plan for scale-up must be established prior to the emergency.
Deployment of mechanisms to identify and respond to uniquely stressed care capabilities within the system (e.g., overwhelmed EDs, intensive care units [ICUs], mental/behavioral health practices, longterm care facilities, health centers, etc.)	Logistics	Prior to emergencies, systems should identify what types of care are appropriate to be handled by telehealth. Systems should also establish a plan that covers the steps needed to handle "overflow" cases via telehealth during high-stress periods.
Referrals to in-person visits when a clinical issue should not be addressed via telehealth Decrease in wait times	Logistics; Effectiveness Experience	Some conditions are appropriate to treat via telehealth (e.g., behavioral health evaluation and therapy). Other conditions may require an inperson visit for effective care (e.g., infections that require additional laboratory testing or shots that need to be administered as part of treatment), or a hybrid of telehealth and in-person care. Wait times may be reduced for telehealth patients
for patients	Experience	due to increased access to providers, reduced delays from travel, more efficient check-in, etc.
Providers can see complex patients more efficiently	Access to Care; Effectiveness	Depending on the interoperability and efficiency of telehealth systems, telehealth could increase care coordination/transfer of information and availability of specialty providers to improve care for complex patients.
Telehealth offers the same quality of services across a population of similar patients	Effectiveness	Telehealth should provide consistent quality of care for patients.

Measure Concept	Relevant Framework Domains	Notes
Comparison between in-person and telehealth for clinical quality and value across all six domains from the Institute of Medicine (IOM)	Effectiveness	The same quality of care should be provided regardless of modality (in-person versus telehealth) when treating telehealth-appropriate conditions. Clinical quality and value considerations include safety, effectiveness, person-centeredness, timeliness, efficiency, and equity.

Measurement Recommendations

Based on Committee discussions, several recommendations were offered to advance rural telehealth measurement for time-sensitive emergencies, public health emergencies, and disasters.

Recommendation #1: Measures of general health outcomes, access to care, and care coordination exist and are endorsed by NQF. Many of these measures can potentially be used to assess the impact of rural telehealth indirectly. For example, telehealth would be expected to increase access to care; improve general care and health outcomes, including hospital admissions and readmissions and days at home in the last six months of life; and support addressing SDOH. These measures are relevant for both acute conditions and chronic disease management, the latter of which is important during public health emergencies such as COVID-19 in which regular care is disrupted for prolonged periods of time. (Access to Care; Effectiveness; Equity)

Recommendation #2: Existing measures of behavioral health and substance use could be used or adapted to assess the impact of telehealth services on rural communities. Rural residents are at higher risk for these conditions, and behavioral health services are deliverable through telehealth technology. (Access to Care; Effectiveness; Equity)

Recommendation #3: Measures of care coordination and planning are generally applicable across multiple conditions and are directly relevant to rural telehealth, particularly during public health emergencies, such as COVID-19. Several existing measures could be used or adapted to assess care coordination. Because these services may be less accessible in rural areas, performance on these measures would be expected to improve with increased use of telehealth in rural areas. (Access to Care; Effectiveness)

Recommendation #4: Measures for rural telehealth should be developed that address patient access to internet and internet-enabled devices, as well as measures of broadband capacity to deliver telehealth services within rural communities. Interoperability is also a vital component that supports high quality care delivery; telehealth visit data should be interoperable with other health information systems that contain patient data. (Access to Care; Logistics)

Recommendation #5: Measures that assess the patient experience with rural telehealth should be developed or adapted from existing measures (e.g., Consumer Assessment of Healthcare Providers and Systems [CAHPS]). However, specific questions should focus on technology experience, accessibility, time to request a visit, and whether it resulted in effective avoidance of travel and/or in-person care,

which would also need to be included. Experience measures could also include assessments of patients' understanding of their visits. (Experience; Logistics)

Recommendation #6: Novel rural telehealth measures should factor rural-specific considerations, including the potential for small sample sizes, which have an impact on the reliability and validity of measure scores. In addition, measures should consider potential unintended consequences of rural telehealth, such as drawing local care into a centralized service and limiting the business of in-person rural healthcare services. (Rural Considerations)

Recommendation #7: Measures that directly assess the quality of telehealth should be developed to ensure that quality is improved by utilizing telehealth technology, care is appropriate for telehealth, or recommended care was received following a telehealth visit. This may involve assessing outcomes or processes of care related to specific healthcare activities or conditions. Telestroke is an example in which existing measures could be used to assess how telehealth could improve the quality of time-dependent stroke services. Future quality measurement development could also assess whether telehealth was an appropriate service by assessing whether conditions are telehealth-sensitive (i.e., should and can be diagnosed through telehealth). Alternatively, future measures could be developed to assess whether in-person care was utilized when recommended following a telehealth visit (e.g., a telehealth diagnosis of chest pain referred for an in-person electrocardiogram [EKG] and labs to rule out acute myocardial infarction). Current measures of antibiotic overuse that exist to assess telehealth quality in general (e.g., antibiotic use for acute respiratory infections) may not be appropriate for use during a disaster or public health emergency. (Effectiveness)

Recommendation #8: Telehealth measures should be developed that assess team-based care delivery and access to specialist care, which are both directly feasible using telehealth-based conferencing technology. Telehealth can increase access to acute care, including stroke or emergency care, and improve multidisciplinary coordination required during longer-term public health emergencies. (Access to Care; Effectiveness)

Recommendation #9: Novel telehealth measures should be developed to directly assess equity. For example, measures could be developed to determine whether specific assessments or interventions related to SDOH were delivered during telehealth visits. In addition, telehealth measures could be developed that target non-English-speaking patients, thus ensuring the presence of language translation services or the utilization of translation services when requested by the patient or the family. Equity measurement could also be integrated into patient experience assessments during telehealth visits, such as whether care was delivered in a culturally competent manner. Lastly, existing and future telehealth measures should also be assessed for disparities in care, and where disparities exist, consideration should be given to risk-adjust for disparities in care. (Equity)

Recommendation #10: Given the increased role of telehealth during COVID-19, structural measures should be developed to assess organizational capacity to appropriately use or shift to using telehealth services, remote patient monitoring, in-home hospital care, and other related services that provide alternative sites of care during disasters and public health emergencies. The readiness of entities to use telehealth services could be evaluated with process measures. (Access to Care; Effectiveness)

Conclusion

Telehealth is an increasingly important component of healthcare delivery, particularly with its rapid growth during the COVID-19 pandemic. Telehealth can improve care by increasing the connection between clinicians and patients and among clinicians. Telehealth has the potential to improve access to care for rural Americans who are at higher risk for mental, physical, and substance use conditions and have less access to healthcare in their communities. Telehealth can also be particularly effective for delivering healthcare services during public health emergencies and disasters, as well as during timesensitive emergencies. Telehealth can also improve situational awareness during disasters and emergencies, thus improving the ability of organizations and communities to achieve all-hazards preparedness by improving access to care and enhancing communication. Yet despite its growth, the measurement of telehealth for time-sensitive and public health emergencies has not been broadly developed. This is particularly important to meet the needs of rural residents. In this project, we described the current state of quality measurement as well as several next steps that will be required to advance the field.

Through the literature review and Committee feedback, NQF identified several existing measures that could be adapted to assess rural telehealth, particularly general process, and outcome measures for care, which would be directly or indirectly affected by telehealth. In addition, measures of behavioral health and care coordination are particularly relevant due to the focal need for these services in rural communities. Existing measures could be used or adapted, or novel measures could be created to assess these important services. Several measure gaps were also identified to inform future measure development. The focus of the measure gaps includes the expansion of both person-centered measures, such as expanding patient experience measures to include telehealth components, technology access, direct quality of care for telehealth, and access to specialty care, as well as structural measures that assess the presence of telehealth services within an organization or community.

Specific recommendations include adapting current measures to assess telehealth with a focus on medical care, behavioral health, specialist care, and care coordination. Such measures should account for rural-specific considerations as well as directly addressing health equity. Measures of patient access to telehealth and the ability to connect with providers through adequate broadband in rural areas are vital to assessing the quality of healthcare during disasters. Patient experience with telehealth is an area where measures can be adapted from existing experience measures. Finally, there is a need to develop novel quality measures that assess the quality of care delivered by telehealth directly, examining care processes and outcomes such as appropriateness of treatment and the receipt of longitudinal care post-visit.

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Appendix B: Final List of Measures

Category	NQF	Endorsement	Measure	Notes
<i>,</i>	ID	Status		
Access	N/A	Not Endorsed	Access to Care (Agency for Healthcare	
			Research and Quality)	
Access	N/A	Not Endorsed	Access to Specialists (Agency for	
			Healthcare Research and Quality)	
Acute	N/A	Not Endorsed	Emergent Care for Improper	
			Medication Administration,	
			Medication Side Effects	
Acute	N/A	Not Endorsed	Hospital 30-Day, All-Cause, Risk-	
			Standardized Mortality Rate	
_			Following Acute Ischemic Stroke	
Acute	N/A	Not Endorsed	Median Admit Decision Time to ED	
			Departure Time for Admitted Patients	
A.I., * *	2400	e.dd	(eCQM)	
Admissions	<u>3490</u>	Endorsed	Admissions and Emergency	
			Department (ED) Visits for Patients	
Admissions	2000	Endorsed	Receiving Outpatient Chemotherapy All-Cause Unplanned Admissions for	
Admissions	<u>2888</u>	Endorsed	Patients With Multiple Chronic	
			Conditions	
Admissions	0272	Endorsement	Diabetes Short-Term Complications	Developer could
Aumssions	0272	Removed	Admission Rate (PQI01-AD)	no longer support
		Kemoved	Admission rate (FQ101 AD)	maintenance.
Admissions	0275	Endorsement	Chronic Obstructive Pulmonary	Developer could
/tamissions	0273	Removed	Disease (COPD) or Asthma in Older	no longer support
			Adults Admission Rate (PQI05-AD)	maintenance.
Admissions	0277	Endorsement	Heart Failure Admission Rate (PQI08-	Developer could
		Removed	AD)	no longer support
				maintenance.
Behavioral	3175	Endorsed	Continuity of Pharmacotherapy for	
Health			Opioid Use Disorder (OUD)	
Behavioral	0576	Endorsed	Follow-Up After Hospitalization for	
Health			Mental Illness	
Behavioral	0004	Endorsed	Initiation and Engagement of Alcohol	
Health			and Other Drug Dependence	
			Treatment	
Behavioral	0418/	Endorsement	Preventive Care and Screening:	Developer did not
Health	<u>0418e</u>	Removed	Screening for Depression and Follow-	resubmit this
			Up Plan	measure for
				endorsement, but
				plans to maintain
				this measure
				independently.
Behavioral	<u>2152</u>	Endorsed	Preventive Care and Screening:	
Health			Unhealthy Alcohol Use: Screening &	
0	0226	F. d !	Brief Counseling	
Coordination	<u>0326</u>	Endorsed	Advance Care Plan	

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Category	NQF ID	Endorsement Status	Measure	Notes
Coordination	0006	Endorsed	Care Coordination (Centers for Medicare & Medicaid Services)	
Coordination	N/A	Not Endorsed	Closing the Referral Loop: Receipt of Specialist Report	
Coordination	<u>N/A</u>	Not Endorsed	Drug Regimen Review Conducted With Follow-Up for Identified Issues PAC IRF QRP	
Coordination	0097	Endorsed	Medication Reconciliation Post- Discharge	
Coordination	<u>N/A</u>	Not Endorsed	Transfer of Health Information to the Patient Post-Acute Care (PAC)	
Coordination	N/A	Not Endorsed	Transfer of Health Information to the Provider Post-Acute Care (PAC)	
Experience	<u>N/A</u>	Not Endorsed	CAHPS Health Information Technology Item Set	
Readmission	1768	Endorsement Removed	Plan All-Cause Readmissions	Withdrawn from the NQF endorsement process by the developer, but being maintained
Readmission	N/A	Not Endorsed	Potentially Preventable 30-Day Post- Discharge Readmission Measure (Claims Based)	
Readmission	1789	Endorsed	Risk-Standardized, All-Condition Readmission	

Appendix C: Final List of Measure Concepts

Delever 5	M	County Management
Relevant Framework	Measure Concept	Sample Measure
Domain		
Access to Care	Availability of reliable broadband	Structure: (%) broadband capacity
	for patients and providers to	available within a geography (ZIP
	participate in telehealth visits	code or other)
Access to Care	Overall number of multidisciplinary	Process: number of clinical
	visits	encounters for patients, which
		involve two or more clinicians
Access to Care	Data access in telehealth for	Structure: interoperability of health
_	patients	data for telehealth patients
Access to Care	Data access in telehealth for those	Structure: interoperability of health
	who consult to the primary care	data for telehealth patients
	provider	
Access to Care	Data access in telehealth for those	Structure: interoperability of health
	who treat the patient	data for telehealth patients
Access to Care	Able to provide psychological care	Process: number of behavioral health
	during emergencies	visits provided via telehealth within
		30 days of an emergency event
Access to Care;	Telehealth decreases the amount of	Process: time between entering
Logistics	time needed to connect patients	healthcare facility and being directed
	with specialist care	to appropriate care
Access to Care;	Telehealth decreases the amount of	Process: time between presentation
Logistics	time needed to address trauma	in ED and treatment of any trauma
	during disasters	
Access to Care;	Able to provide care without	Structure: direct hospital admission
Logistics	admission into the ER	process bypassing ED using
		telehealth; number of open
_		emergency department beds
Access to Care;	The lack of telehealth led to a	Outcome: avoidable adverse
Logistics	delayed diagnosis	outcomes attributable to telehealth
	- W. C. W. I	services
Access to Care;	Travel to a medical facility because	Outcome: patient experience with
Logistics	of a telehealth diagnosis	telehealth
Access to Care;	Travel was eliminated or reduced	Outcome: patient experience with
Logistics; Experience	for a specific patient encounter	telehealth
Access to Carra	because of telehealth services	Outcome solf none at all actions
Access to Care;	Removing geographic limitations	Outcome: self-reported patient
Experience;	increased the volume of specialty	access to specialty care
Assess to Corp.	providers	Dragage number of clinical
Access to Care;	Providers can see complex patients	Process: number of clinical
Effectiveness	more efficiently	encounters for patients with four or
Access to Cours	Ingressed likelihaad fan a matiant i	more chronic conditions
Access to Care;	Increased likelihood for a patient to	Process: use of telehealth as a
Effectiveness	access the telehealth modality for	proportion of visits within a defined
1	an encounter	population
Logistics	Creation of plans and systems to	Structure: use of telehealth between
	develop alternate care sites during a	patients and clinicians during a
	disaster	disaster or public health emergency

Relevant Framework Domain	Measure Concept	Sample Measure
Logistics	Creation, resourcing, and active practice of plans to create additional surge capacity in hospital and nonhospital settings	Structure: a process to use telehealth for hospital-based care in the home or in other settings (i.e., hospital-athome)
Logistics	Creation, resourcing, and annual review of an emergency management program consisting of sufficient staff with sufficient expertise in healthcare emergency management	Structure: telehealth process included in the emergency management plan
Logistics	Identification of a methodology without operable health IT systems to track and monitor patients within and across health systems during and after a disaster, including success in repatriation of evacuated patients and reunification with family	
Logistics	Deployment of mechanisms to identify and respond to uniquely stressed care capabilities within the system (e.g., overwhelmed EDs, ICUs, mental/behavioral health practices, long-term care facilities, health centers, etc.)	Structure: telehealth process in place to augment on-site care - Use cases ED, ICU, behavioral health, long-term care
Logistics	Identification of sites within and outside of the system that can provide alternate level of care bed availability	Structure: a process to use telehealth for hospital-based care in the home or in other settings (i.e., hospital-athome)
Logistics	Remote patient monitoring included	Structure: remote patient monitoring services provided to rural patients
Logistics; Effectiveness	Referrals to in-person visits when a clinical issue cannot be addressed via telehealth	Process: rate of in-person visits following a telehealth recommendation for in-person care
Logistics; Effectiveness	Referrals to in-person visits when a clinical issue should not be addressed via telehealth	Process: rate of in-person visits following a diagnosis that is not telehealth-sensitive
Logistics	Tracking and monitoring of patients transitioned to alternate levels of care during a disaster	Structure: a process to use telehealth for hospital-based care in the home or in other settings (i.e., hospital-athome)
Logistics; Experience	Monitoring and oversight of staff who have been assigned outside of normal duty areas to ensure quality of care and competency during a disaster	

Relevant Framework Domain	Measure Concept	Sample Measure
Logistics; Experience; Effectiveness	Increased use of services	Process: use of telehealth as a proportion of visits within a defined population
Logistics; Experience; Effectiveness	Reduction in diagnostic errors and avoidance of an adverse outcome because of telehealth	Outcome: avoidable adverse outcomes attributable to telehealth services
Experience	Physician comfort with care delivered over digital services	Outcome: physician experience with telehealth
Experience	Decrease in wait times for patients	Process: time from request to physician visit
Experience	Impact of telehealth services on the workforce shortage	General staffing metrics (i.e., nursing ratios), measured when telehealth is delivered
Experience	Overall improvement in quality of life because services are received at home	Outcome: patient experience with telehealth; Outcome: patient quality of life with telehealth
Experience	Patient demonstrated compliance with their care plan	Outcome: self-reported medication adherence by patients; Outcome: self-reported care plan adherence by patients
Experience	Patient demonstrated increased understanding of care plan	Outcome: patient understanding of care
Experience	Patients are able to interpret diagnosis and treatment instructions through the telehealth modality	Outcome: patient experience with telehealth
Experience	Satisfactory visit for both the patient and provider	Outcome: patient experience with telehealth; patient felt that provider spent enough time with them during their visit
Experience	Patient convenience measures (patient centered)	Outcome: patient experience with telehealth
Experience; Effectiveness	Technologies were in a satisfying condition for providers to do their job	Outcome: patient experience with telehealth
Effectiveness	Telehealth offers the same quality of services across a population of similar patients	General process and outcome measures, measured when telehealth is delivered
Effectiveness	The healthcare system was able to effectively provide the care that was recommended during a natural disaster and/or emergency because of telehealth	Outcome: self-reported medication adherence by patients; Outcome: self-reported care plan adherence by patients
Effectiveness	Tracking and monitoring of effectiveness of delivery of family/caregiver support plans during a disaster	Outcome: self-reported medication adherence by patients; Outcome: self-reported care plan adherence by patients

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Relevant Framework Domain	Measure Concept	Sample Measure
Effectiveness	Comparison between in-person and telehealth for clinical quality and value (value = cost / quality) – across all six domains from IOM	General process and outcome measures, measured when telehealth is delivered
Effectiveness	Patient safety issues (errors) – review claims for patterns of follow-up visits post-telehealth visits	Outcome: medical errors identified related to telehealth visits

