

Telemedicine

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Time	Notes
:23	Lots of questions coming in the hotline on telemedicine
:38	Telemedicine <ul style="list-style-type: none">• Not really a defined term.• Think of it as a way to access medical services over the phone or the internet.• Telemedicine has been around a while, but is getting a lot of attention currently as plans look for ways to become more efficient and cost-effective.
1:20	Structures & Design <ul style="list-style-type: none">• Some telemedicine programs are more like EAPs. They provide resources and referrals.• Increasingly, telemedicine plans are designed as alternatives to physical visits to a doctor's office.
2:45	ERISA. ERISA considerations for telemedicine programs that are intended to serve as a replacement for physical visits to a doctor's office include: <ul style="list-style-type: none">• Formal written plan documents, and SPD distribution,• Form 5500 reporting if there are 100 or more participants. The easiest way to meet these requirements is by using a wrap document (include it in what is already prepared for the employer's group medical plan).
3:35	COBRA. As a group health plan providing significant medical benefits, COBRA requirements will apply to telemedicine programs. If the telemedicine services are integrated with the employer's group medical plan (offered only to those participating in the medical plan), then it may be bundled with the medical plan when offering COBRA. Think of a telemedicine program as nothing more than a feature of a group health plan.
4:35	ACA – Healthcare Reform. <ul style="list-style-type: none">• The guidance isn't perfectly clear, but it appears that telemedicine programs subject to ERISA must be integrated with group health plans that are ACA compliant.• This generally means that eligibility for the telemedicine program must be limited to those who are enrolled in the employer's group health plan.

5:54	<p>Telemedicine impact on HSA eligibility</p> <ul style="list-style-type: none">• Telemedicine programs can cause problems with HSA eligibility.• That’s because, in many cases, telemedicine programs provide medical care (other than preventive) with no cost sharing or reduced copays.• Remember – HSA eligibility depends on the participant paying fair market value for all medical care (other than preventive) prior to reaching their deductible.• There are workarounds here. The point is to keep this issue in mind whenever you have a telemedicine program.
7:11	<p>Summary</p> <ul style="list-style-type: none">• Telemedicine is evolving as a feature of group health plans.• In most cases a telemedicine program must be tied closely to a group health plan offering. That means no separate eligibility or participation.• Plan sponsors with HDHP/HSA plan designs have some extra things to consider when implementing telemedicine programs.