## Joint Commission on Health Care

## Study of Strategies to Extend Health Care Access to Vulnerable Populations

Mobile Health Clinic Policy Options	Public Comment
<b>Option 1:</b> The Joint Commission on Health Care could introduce legislation directing the Board of Pharmacy to work with the Department of Behavioral Health and Developmental Services to develop a process by which opioid treatment programs can apply for and receive necessary permissions and waivers to allow dispensing of opioid use disorder treatment medications from mobile units. The Board would report on the status of the process and any barriers to developing and implementing such process to the Joint Commission on Health Care by November 1, 2025.	No public comment
<b>Option 2:</b> The Joint Commission on Health Care could introduce legislation directing the Department of Housing and Community Development to include broadband access services for mobile health clinics as a priority for broadband adoption programs using Broadband Equity, Access, and Deployment Program funding, as part of the Department's broader initiative to support other telehealth adoption programs.	No public comment
<b>Option 3:</b> The Joint Commission on Health Care could introduce a budget amendment to provide \$2.4 million to the Virginia Department of Health to establish a grant program to support up to five mobile health clinics operated by local health departments and community-based organizations that provide services in rural and underserved areas.	<u>Support</u> : Virginia Health Catalyst
Community Paramedicine Policy Options	Public Comment
<b>Option 4:</b> The Joint Commission on Health Care could introduce legislation directing the Virginia Department of Health's Office of Emergency Medical Services to report to the Joint Commission on Health Care by October 1, 2025, regarding the status of draft regulations related to community paramedicine and mobile integrated healthcare.	No public comment
Proposed amendment to Option 4:	
As part of its update, OEMS should also report on the feasibility of integrating telehealth services into the delivery of emergency medical services provided by emergency medical services providers at the scene of an emergency. [Proposed by Delegate Orrock]	

Community Paramedicine Policy Options, cont'd	Public Comment
<b>Option 5:</b> The Joint Commission on Health Care could introduce a budget amendment to provide \$1.8 million to the Virginia Department of Health to establish a grant program or expand an existing grant program administered by Office of Emergency Medical Services to provide funding to allow up to 10 emergency medical services agencies to establish community paramedicine and mobile integrated healthcare programs.	No public comment
Proposed amendment to Option 5:	
The Joint Commission on Health Care could introduce a budget amendment to provide \$1.8 million to the Virginia Department of Health to establish a pilot program administered by Office of Emergency Medical Services to provide funding to local governments to establish community paramedicine and mobile integrated healthcare programs. [Proposed by Senator Favola]	
<b>Option 6:</b> The Joint Commission on Health Care could introduce	Support:
legislation directing the Department of Medical Assistance Services to cover HCPCS Code A0998 treatment without transport when Medicaid patients call 911.	Virginia Association of Health Plans
<b>Option 7:</b> The Joint Commission on Health Care could introduce legislation directing the Department of Medical Assistance Services (DMAS) to work with the Virginia Department of Health's Office of Emergency Medical Services to develop a plan for reimbursing community paramedicine and mobile integrated healthcare services in Virginia, in consultation with community paramedicine programs and other stakeholders including hospital systems and health plans. The plan should specify the circumstances under which services would be covered; eligible patient populations; eligible providers; whether the model would require a State Plan Amendment or modification of Medicaid managed care contracts; and whether reimbursement would be a flat fee or allow billing for individual services. DMAS would report to the Joint Commission on Health Care by October 1, 2025, regarding the content of the plan.	<b>Support:</b> Virginia Association of Health Plans
<b>Option 8:</b> The Joint Commission on Health Care could introduce legislation directing the Department of Medical Assistance Services to seek approval from the Centers for Medicare and Medicaid Services for implementation of the Ground Emergency Medical Transportation (GEMT) program in Virginia, to allow emergency medical services providers in Virginia to receive supplemental reimbursement for uncompensated costs related to the transfer of Medicaid patients.	<b>Support:</b> Virginia Association of Health Plans

Home Visiting Policy Options	Public Comment
<b>Option 9:</b> The Joint Commission on Health Care could introduce a budget amendment to provide \$4,541,671 to Families Forward Virginia to serve a new cohort of parents that will be part of a randomized control trial required to collect evidence to be submitted to the federal Department of Health and Human Services to determine whether CHIP of Virginia meets criteria for certification as an evidence-based home visiting model consistent with the Department's Home Visiting Evidence of Effectiveness criteria.	Support: 74 comments in support; see attached
<b>Option 10:</b> The JCHC could introduce legislation directing the Department of Medical Assistance Services, in conjunction with relevant stakeholders, to convene a workgroup to develop a plan for home visiting benefit for pregnant and postpartum individuals and their families. The workgroup shall develop consensus with stakeholders and make recommendations in the plan regarding the design of various program elements including service definitions, administrative structure, eligibility criteria, provider participation requirements, population prevalence, service setting options, and federal evaluation requirements, to guide any future cost impact analysis for the proposed home visiting benefit that may be required. The Department would report to the Joint Commission on Health Care and the Chairs of the House Appropriations and Senate Finance and Appropriations Committees by October 1st, 2025, regarding the plan for the design of a home visiting benefit and any next steps which shall be necessary for federal approval and implementation of the home visiting benefit.	Support: 51 comments in support; see attached
Community Health Workers Policy Options	Public Comment
<b>Option 11:</b> The Joint Commission on Health Care could introduce a budget amendment to provide an additional \$2.5 million to the Virginia Department of Health (VDH) in Fiscal Year 2026 to support all remaining community health worker (CHW) positions initially supported by federal funding and remove language requiring VDH to prioritize CHW positions in high maternal mortality areas to allow flexibility of localities to develop and implement CHW-led programs that address community needs.	<u>Support</u> : Virginia Community Health Worker Association

Community Health Workers Policy Options, cont'd	Public Comment
<b>Option 12:</b> The Joint Commission on Health Care could introduce a budget amendment directing the Virginia Department of Health to report annually, by November 1, to the Chairs of the Senate Finance and Appropriations and House Appropriations Committees and the Director of Department of Planning and Budget regarding the numbers of community health workers (CHWs) employed within state and local health departments, the type of services provided by CHWs and performance and outcome measures for such services, the need for additional CHWs to meet demand for services provided by state and local health departments, any success in attracting non-state resources, and descriptions of the contracts entered by localities.	<u>Support:</u> Virginia Community Health Worker Association
<b>Option 13:</b> The Joint Commission on Health Care could introduce a budget amendment directing the Department of Medical Assistance Services (DMAS) to convene a work group of stakeholders to design a state plan amendment (SPA) to provide reimbursement for services provided by Certified Community Health Workers (CCHWs). The plan shall include service definitions, administrative structure, eligibility criteria, provider participation requirements, population prevalence, service setting options, and federal evaluation requirements. The Department shall report to the Joint Commission on Health Care and the Chairs of the House Appropriations and Senate Finance and Appropriations Committees regarding the plan for a SPA to provide reimbursement for services provided by CCHWs and any next steps necessary for federal approval and implementation of the SPA by October 1, 2025.	Support: Virginia Association of Health Plans Virginia Health Catalyst Virginia Community Health Worker Association
<b>Option 14</b> The Joint Commission on Health Care could introduce a budget amendment directing the Department of Medical Assistance Services to convene a workgroup to identify opportunities to expand use of community health workers by Medicaid managed care organizations.	Support: Virginia Association of Health Plans Virginia Community Health Worker Association

Community Health Workers Policy Options, cont'd	Public Comment
<b>Option 15:</b> The Joint Commission on Health Care could introduce legislation directing the Virginia Department of Health (VDH) to convene a work group composed of representatives of the Department of Behavioral Health and Developmental Services (DBHDS), Department of Medical Assistance Services (DMAS), and other relevant stakeholders to determine the feasibility of developing flexible training and certification standards that allow community health workers (CHWs) to use their education and experience to satisfy some of the requirements for qualification as a state- certified doula or registered peer recovery specialist. The workgroup would report on activities to the Joint Commission on Health Care and the chairs of the Senate Committee on Education and Health and House Committee on Health and Human Services by October 1, 2025.	Support: Virginia Community Health Worker Association
<b>Option 16:</b> The Joint Commission on Health Care could introduce a budget amendment to provide \$250,000 annually to the Virginia Community Health Worker Association (VACHWA) to, in partnership with relevant stakeholders, expand workforce development efforts for community health workers. The VCHWA would report to the Joint Commission on Health Care and the chairs of the Senate Committee Education and Health, and House Committee on Health and Human Services by October 1, 2025, regarding plans for the use of such funding.	Support: Virginia Community Health Worker Association Transformative Changes
Telehealth Policy Options	Public Comment
<b>Option 17:</b> The Joint Commission on Health Care could introduce a budget amendment to provide \$127,224 to the Virginia Department of Health to cover the cost of salary and benefits for a new Telehealth Coordinator position at the Virginia Department of Health.	Support: Virginia Association of Counties Virginia Health Catalyst
<b>Option 18:</b> The Joint Commission on Health Care could introduce legislation directing the Department of Behavioral Health and Developmental Services to work with relevant state agencies and stakeholders to develop and disseminate best practice educational training for providers on how to conduct telehealth visits for patients with disabilities, including individuals with intellectual and developmental disabilities.	Support: Virginia Association of Counties

Telehealth Policy Options, cont'd	Public Comment
<b>Option 19:</b> The Joint Commission on Health Care could introduce a budget amendment to provide \$150,000 to the Virginia Telehealth Network (VTN) to conduct a feasibility study and develop a plan to implement a pilot program to provide funding for Pharmacy Care Hubs, particularly for Medicaid patients. The VTN would report to the Joint Commission on Health Care by November 1, 2026, regarding the results of the feasibility study and the plan to implement additional Pharmacy Care Hubs in Virginia.	<u>Support:</u> Virginia Association of Counties
<b>Option 20:</b> The Joint Commission on Health Care could introduce legislation directing the Virginia Board of Education to require local boards of education to establish policies to facilitate students' access to telehealth services during the school day, including designating private spaces for appointments to occur.	Support: Virginia Health Catalyst Amendment requested: Virginia Association of Counties
<b>Option 21:</b> The Joint Commission on Health Care could introduce a budget amendment to appropriate the funds for e-consults. Proposed revised language for Option 21: The Joint Commission on Health Care could introduce a budget amendment authorizing the Department of Medical Assistance Services to provide reimbursement for provider-to-provider consultations delivered through telehealth, consistent with the state plan and in a manner that is budget neutral and does not increase costs. The Department shall promulgate emergency regulations to implement this change.	Support: Virginia Association of Counties Virginia Health Catalyst Oppose: Virginia Association of Health Plans
<b>Option 22:</b> The Joint Commission on Health Care could introduce legislation directing the Department of Medical Assistance Services to develop a plan and estimate costs for expanding eligibility criteria under Medicaid for remote patient monitoring for individuals with chronic conditions and to report to the Joint Commission on Health Care by October 1, 2025, regarding such plan and estimated costs.	<u>Support:</u> Virginia Association of Counties

Telehealth Policy Options, cont'd	Public Comment
<b>Option 23:</b> The Joint Commission on Health Care could introduce legislation removing the exclusion of audio-only telephonic communication from the definition of telemedicine and requiring insurers to cover audio-only telephone telehealth visits to the same extent that they cover other types of telemedicine services in cases in which audio-only telephone telehealth services are clinically appropriate, provided consistent with the same standard of care as is applicable to comparable in-person services, and utilized only in cases in which other forms of telehealth are not available or cannot be accessed by the patient.	Support: Virginia Association of Counties Virginia Health Catalyst Oppose: Virginia Association of Health Plans
<b>Option 24:</b> The Joint Commission on Health Care could introduce a budget amendment to increase funding for the Virginia Telemental Health Initiative by \$482,000 to support increasing patients served by 50 percent.	Support: Virginia Association of Counties
<b>Option 25:</b> The Joint Commission on Health Care could introduce a budget amendment to provide \$178,503 to Virginia Health Catalyst to, in collaboration with the Oral Health Task Force, plan and implement a one year pilot program, through Federal Qualified Health Centers and local community health centers, in which dental hygienists deliver teledentistry services in three nursing homes.	Support: Virginia Association of Counties Virginia Health Catalyst
<b>Option 26:</b> The Joint Commission on Health Care could introduce legislation requiring the Department of Corrections (VADOC) and the Virginia Board of Local and Regional Jails to establish policies to accommodate inmates needing to participate in telehealth appointments, including designating a private space for such appointments to occur.	<u>Amendment</u> requested: Virginia Association of Counties
Proposed amendment to Option 26: VADOC and the Virginia Board of Local and Regional Jails should provide an update to the JCHC by October 1, 2025, on the current status of telehealth policies, opportunities to expand telehealth programs, and recommended strategies to reduce gaps or barriers to telehealth service delivery.	

Public comment in support of Policy Option 9 was received from:

Addy Cooley, Family Lifeline Alan Gollihue, Portsmouth General Hospital Foundation Alex Rooke, Family Lifeline Amy Fox, Children's Hospital of Richmond at VCU Amy Malloy Andrea Long, The Up Center Andrea Tingler, CHIP Angela Nichols Angela Thomas, MedStar Health Angela Woodley Crawley, Thrive Virginia Anna Chamberlain, Family Lifeline April Doughtie, CHIP of South Hampton Roads April Duff, Family Lifeline Ashley Vercher, Sankofa Family Center - CHIP of South Hampton Roads Bobby Dyer, City of Virginia Beach Carolyn Maddox, CHIP of South Hampton Roads Cathy Downs, Family Lifeline Christine Camper, Families Forward Virginia & Parents as Teachers State Office Christopher Fuller, M&T Bank Cynthia Romero, M. Foscue Brock Institute for Community and Global Health at Old Dominion University, Dana Jennings, Roanoke City Department of Social Services Debbie Winters, CHIP of South Hampton Roads Douglas E. Pierce, Emily MacCartney, CHIP of South Hampton Roads

Evelyn Jimenez Hernandez, CHIP of South Hampton Roads Grayson Hollingsworth, CHIP of Roanoke Valley Gregg Winston Haley Gladden, Family Lifeline J Copeland, CHIP Jacob Kerkhoff, Family Lifeline Jamia Crockett, Families Forward Virginia *Jennifer Case, Family Lifeline* Jennifer Fiechtner, Healthy Families Virginia/Families Forward Virginia *Jill Schweigart, HumanKind* John Jertson Jon Nafziger, Child Health Partnership Juandiego Wade, City of Charlottesville K. Hope Schutte, Healthy Families Virginia/Families Forward Virginia Katrice Everett, CHIP of South Hampton Roads Kenny Alexander, City of Norfolk Kenston Farmer, CHIP of South Hampton Roads Lajeanne Boyd Makayla Boyd, Healthy Families Southwest VA Meredith Fulcher, Healthy Families Central Virginia Meredith Thompson, CHIP of Roanoke Valley Michele Powell, Families Forward Virginia Midge Woods, CHIP of South Hampton Roads Mike Cumming, CHIP of South Hampton Roads Mozell H Booker, Child Health Partnership Mylinda Moore, Philip Saul, Family Lifeline Phyllis Stoneburner, Healthy Chesapeake

Rachel B. Hopkins, CHIP of Roanoke Valley	Starr Mason
Raven Armstrong, CHIP of South Hampton Roads	Stephanie Bryson, New River Community Action
Ravi Respeto, United Way of Greater Charlottesville	Tameka Davis, The Up Center
	Tershawna Shannon, CHIP of South Hampton
Rhonda G. Shannon, Carilion Clinic	Roads
Rhonda Seltz, New River Community Action CHIP Advisory Committee	Thel Dominici, CHIP of South Hampton Roads
	Tiffany Gray, CHIP of South Hampton Roads
Richard West, City of Chesapeake	Tina Ross
Sedonnah Carter, Family Lifeline	Toya Trager, Child Health Partnership
Serwa Ertl,	Wendy Simon, Sankofa Family Center - CHIP of
Sharon Chickering, CHIP of Roanoke Valley	South Hampton Roads
Sheila Kelley, CHIP of South Hampton Roads	Katie Boyle, Virginia Association of Counties
Simone Hill, CHIP of South Hampton Roads	Sarah Bedard Holland, Virginia Health Catalyst

## Public comment in **support** of **Policy Option 10** was received from:

Addy Cooley, Family Lifeline Cynthia Romero, M. Foscue Brock Institute for Community and Global Health at Old Dominion Alex Rooke, Family Lifeline University Amy Fox, Children's Hospital of Richmond at Darlene Ransom, Mile High Kids Community VCU Development Andrea Long, The Up Center Dashonda Fagains, Three Rivers Healthy Anna Chamberlain, Family Lifeline Families April Duff, Family Lifeline Debbie Lancucki, Three Rivers Healthy Families Ashley Graham, HumanKind Elizabeth Anne Whalley, Early Impact Virginia Bergen Nelson, Children's Hospital of Haley Gladden, Family Lifeline Richmond at VCU Jacob Kerkhoff, Family Lifeline Bianka Stuit, Early Impact Virginia Jacqueline Bryant, ReadyKids Brooke Garcia, Healthy Families of the Blue Jamara Knight, Early Impact Virginia Ridge Jean Howard, CA & J Farm/ Mathew County Cathy Downs, Family Lifeline Social Services Board Christine Camper, Families Forward Virginia & Jennifer Case, Family Lifeline Parents as Teachers State Office Jennifer Fiechtner, Healthy Families Christopher Fuller, M&T Bank Virginia/Families Forward Virginia

K. Hope Schutte, Healthy Families Virginia/Families Forward Virginia Kathy Phillips, Three Rivers Healthy Families Keisha Pettaway, Hopewell/Prince George Healthy Families Kendra Parsons, Three Rivers Healthy Families Leslie Meekins, The Up Center - Norfolk Healthy Families Leslye Morrison, Northern Neck Christian School Lindsey Saenz, Healthy Families Central Virginia Lisa Carter, Southern Regional Hospital at Ballad Health Lynn Hudgins, Three Rivers Healthy Families Maria Brown, Family Lifeline Martha Lee, Healthy Families/Early Head Start Melissa Cohen, ReadyKids Meredith Fulcher, Healthy Families Central Virginia Nina Carr, Parent Child Development *Cooperation* Paul Scott, Child Development Resources Philip Saul, Family Lifeline Reggie Rossingnol, Chesapeake Bank Richard Schultz, Chesapeake Bay Regional Early Experiences Council Sedonnah Carter, Family Lifeline Shannon O'Neill, ReadyKids Tameka Davis, The Up Center Tomi Turner, Bedford County Department of Social Services Vanesa Livingstone, Richmond County Department of Social Services Doug Gray, Virginia Association of Health Plans Katie Boyle, Virginia Association of Counties Sarah Bedard Holland, Virginia Health Catalyst