Fraud and Credentialing in Telehealth and Medicine

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Federation of State Medical Boards (FSMB)

☐ Founded in 1912, we are the national, non-profit organization that represents all 70 of the state medical and osteopathic boards across the United States.

☐ State medical boards protect the public through the licensing, disciplining and regulation of 1 million+ physicians, PAs, and other health care professionals.

☐ FSMB supports state medical boards through education, assessment, research and advocacy and promotes regulatory best practices across states.
Interstate Medical Licensure Compact (IMLC)

✓ 33 states, the District of Columbia, and Guam have enacted the model legislation.

✓ The Interstate Medical Licensure Compact grew by four (4) members during the COVID-19 pandemic – Delaware, Louisiana, Ohio, and Texas.

✓ Legislation introduced in 2021 in Missouri, New Jersey, New York, North Carolina, Oregon, and Rhode Island.
Physician Eligibility Requirements for Interstate Medical Licensure Compact

- Graduate of a medical school accredited by LCME, COCA, or a medical school listed in the International Medical Education Directory or its equivalent
- Passed USMLE or COMLEX within 3 attempts, or any of its predecessor's exams accepted by a state medical board
- Completed Graduate Medical Education approved by ACGME or AOA
- Holds specialty certification or a time-unlimited specialty certificate recognized by ABMS or AOA’s Bureau of Osteopathic Specialists (at time of application only)
- Possesses a full and unrestricted license to practice medicine in a Member state
- Has no criminal history
- Has no disciplinary action by a licensing agency
- Has never had a controlled substance license or permit suspended or revoked by the US DEA
- Is not under active investigation by a licensing agency or law enforcement authority
COVID-19: A Watershed for Telemedicine in the U.S.

- Expanded reimbursement of telemedicine by Medicare in March 2020 was a pivotal event.
- Same story in almost every sector of health care from outpatient care to nursing homes.
- A watershed moment in the use and regulation of telemedicine.

Patel SY, et al. JAMA Internal Medicine, 2021
FSMB’s Physician Data Center (PDC)
BACKGROUND & GOALS

+ Grant funded by Health Resources and Services Administration (HRSA) of the U.S. Department of Health and Human Services (HHS), and the Coronavirus Aid, Relief, and Economic Security (CARES) Act.

+ **Goal 1**: Establish communication pathways to facilitate the use of telehealth technologies in response to and preparation for health care emergencies such as COVID-19

+ **Goal 2**: Develop a new technology platform to streamline the process for mobilizing health care professionals during public health emergencies

+ **Goal 3**: Expand the technology platform to encompass other health care professionals

+ **Goal 4**: Provide education and outreach to foster utilization and recognition of Provider Bridge as a resource for responding to public health emergencies
Fraud Prevention Efforts

- Several high-profile fraud cases involving telemedicine technology emerged during the COVID-19 pandemic.
- Defendants in these cases have included licensed medical professionals.
- CMS’ Center for Program Integrity (CPI) is accountable for the prevention and detection of fraud, waste, abuse and errors in the Medicare and Medicaid programs, drawing on data from several sources.
- FSMB provides licensure and disciplinary data for physicians and PAs used in the CPI’s Advanced Provider Screening (APS) tool.