



REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
HEADQUARTERS, U.S. ARMY MEDICAL COMMAND  
2050 WORTH ROAD  
FORT SAM HOUSTON, TEXAS 78234-6000



MCCS-HR (100)

01 JUN 2000

MEMORANDUM FOR Commanders, MEDCOM Major Subordinate Commands

SUBJECT: Policy Memorandum for Legal and Quality Assurance  
Issues Arising from the Use of Telemedicine Technologies

1. REFERENCES: None.
2. PURPOSE: Telemedicine is advocated as a method to improve the access and delivery of health care. Currently, there is no official guidance on how to manage issues of clinical privileges for telemedicine providers, image standards, information security, and documentation. This policy memorandum provides Office of The Surgeon General, Department of the Army (DA), guidance on legal and quality assurance issues to medical treatment facilities (MTFs) and dental treatment facilities (DTFs) participating in telemedicine.
3. SCOPE: This policy memorandum provides guidance to all MTFs and DTFs telemedicine providers.
4. POLICY: The MTF and DTF commanders will disseminate the following legal/quality assurance guidelines to health care providers participating in telemedicine.
  - a. Clinical Privileges:
    - (1) When the consultant does not write patient orders or access the Composite Health Care System (CHCS) at the referring MTF or DTF, but relays recommendations to the referring primary care manager who retains responsibility for the patient, the telemedicine encounter will be considered to occur in the MTF or DTF where the consultant has clinical privileges. Peer review activities will be developed to include rules encompassing the practice of telemedicine.

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(2) When the consultant writes patient orders or accesses CHCS at the referring MTF or DTF, the telemedicine encounter will be considered to occur in the referring MTF or DTF. The consultant must have clinical privileges at the local MTF or DTF. Peer review activities will be developed to include rules encompassing the practice of telemedicine.

b. Image Standards: Clinical specialties will develop standards for technology used for telemedicine encounters.

c. Information Security: Transmission of identifiable patient data will occur over secure networks or use encryption protocols when transmitted over nonsecure networks. Telemedicine networks will be in compliance with Health Insurance Portability and Accountability Act standards when published. Current methods for security will be utilized when loose paper patient documents are involved. Audits will be performed to track log-ons to the system. A method for return-receipt or equivalent will be established to ensure timely and appropriate receipt of data. For video-teleconference (VTC) sessions, patient will be informed of all personnel involved in the VTC encounter and a method for ensuring security of the area will be established so that unauthorized personnel are unable to view the VTC.

d. Informed Consent: Patients will be informed and consent obtained whenever images are transmitted with identifying data over nonsecure networks. The referring primary care manager is responsible for obtaining required consent. The consent form will be retained in the patient's medical record.

e. Documentation in the Patient Record:

(1) Telemedicine encounters will be documented on a Standard Form 513, Medical Record Consultation Sheet, or approved Standard Form 513 facsimile.

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(2) Video-teleconference patient encounters should not be routinely videotaped. If there is a medical indication for videotaping, the patient will be informed that the session is being videotaped, consent will be obtained, and the videotape will be preserved as part of the medical record.

(3) Store-and-forward correspondence relating to patient care will be permanently stored in original form in addition to printing a Standard Form 513 for inclusion in the medical record.

5. Submit recommendations to change this policy on DA Form 2028, Recommended Changes to Publications and Blank Forms, to Commander, U.S. Army Medical Department Center and School, ATTN: MCCS-HR, 3151 Scott Road, Suite 1408, Fort Sam Houston, TX 78234-6135.

6. Our point of contact for this policy memorandum is COL L. Harrison Hassell, Center for Healthcare Education and Studies, Academy of Health Sciences, U.S. Army, Commercial (210) 221-8874, DSN 471-8874, or at E-mail harrison.hassell@amedd.army.mil.

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