

ASERT Telehealth Resource

NOTE: You should always check with state regulations, your licensing body and funder, and your individual agency provider to implementing any new practice.

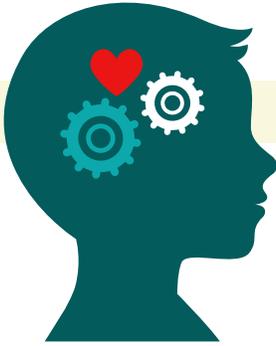


- The coronavirus (also called COVID-19 or novel coronavirus) spreads easily from person to person, so it's recommended that people practice something called "social distancing". This means staying away from other people in order to avoid catching or spreading the virus. It also means that schools, clinics, and offices may close, events may be cancelled, or people may need to work from home.
- This can make it difficult for providers to see their patients/clients/ participants in person.
- The federal government and the Commonwealth of Pennsylvania have made certain changes to regulations and laws to help keep people safe and continue essential services for vulnerable populations during this time.
- Pennsylvania government is now letting providers use telehealth or telemedicine to see people remotely, even though that wasn't always allowed before or it required certain technologies.
- Service providers must determine if the risk of suspending services is greater than the risk of continuing to provide services. If continuing services is a consideration, the provider must then determine if services can be delivered in a manner that does not unduly increase the risk of exposure to COVID-19.
- The Office of Mental Health and Substance Abuse Services (OMHSAS) has issued guidance for the use of telehealth as a delivery method for medically necessary behavioral health services as ordered, referred, or prescribed by a provider or practitioner. This allows services to be delivered effectively while the patient is quarantined, self-quarantined, or self-isolated due to exposure or possible risk of exposure to COVID-19.



What is Telehealth?

- Telehealth is the use of digital information and communication technologies, such as computers and mobile devices, to access services remotely and manage physical and mental health needs.
- Telehealth allows providers to deliver services so clients can receive supports via technology. It is a convenient and safe way to continue providing services while patients are quarantined, self-quarantined, or self-isolated due to exposure of possible risk of exposure to COVID-19.



Benefits to Behavioral Health Providers

- Maintains communication and support with clients without having to travel to a facility, personal home, or be in the community to limit risk of exposure and spread of COVID-19.
- Provides greater flexibility to safely treat clients, participants and patients.
 - Prior to this announcement, Medicare was only allowed to pay clinicians for telehealth services such as routine visits in certain circumstances.
- Now providers can provide telehealth to anyone not just those who are in rural communities.
- Qualified providers should inform their patients that services are available via telehealth.



Next Steps for Providers

- Providers should consult their agency and determine if they are permitted to provide services based on current state and federal regulations.
 - **FOR OMSHAS PROVIDERS:** However, you will need to complete an Attestation Form as required by bulletin OMHSAS-20-02 within 5 days of initiating telehealth. When submitting the attestation for RA-PWTBHS@pa.gov for the COVID-19 state of emergency, please use the subject line “COVID-19 EMERGENCY.”
 - For questions specific to children’s services providers can email: RA-PWIBHS@pa.gov



Benefits of Telehealth for Individuals

- It’s convenient.
 - Clients/participants/patients will be eligible for telehealth services effective March 6, 2020.
 - Patients receive telehealth services from their homes without risking exposure to COVID-19.
- Some services don’t have to stop. Check with your supports coordinators for more information.
- Slows the spread of the virus and helps to keep more people healthy.
- Clients/participants/patients can continue to communicate and get support from their providers.
- Services through telehealth include common office visits, mental health counseling, and preventive health screenings.



What Types of Technology Can Be Used?

- HHS Office for Civil Rights (OCR) will exercise enforcement discretion and waive penalties for HIPAA violations against health care providers that serve patients in good faith through everyday communications technologies.
 - Now, covered health care providers may use online applications that allow for video chats, including Apple FaceTime, Facebook Messenger video chat, Google Hangouts video, or Skype to see their patients, clients, or participants, even they may not fully comply with HIPAA rules. Providers should enable privacy features and encryption options that are available in any of these applications.
 - ▷ Providers **cannot** use public facing technologies (like Facebook Live, Tik Tok, or Twitch) to provide telemedicine services. These are **not** safe.
- During this state of emergency, telehealth will allow the use of telephonic video technology commonly available on smart phones and other electronic devices. In addition, telephone only services may be utilized in situations where video technology is not available.
- Providers should make all good faith efforts to make sure the health information of their patients, clients, and participants is safe. This means being in a private space, away from other people, not disclosing information to others in the household, etc.
- Providers should tell their patients, clients, and participants of potential privacy risks involved in using these technologies.
- Providers must take responsibility to stay updated with changes to federal and state regulations during this time to ensure compliance.



What Types of Providers Can Use Telehealth?

- Staff trained in the use of the telehealth equipment and protocols to provide operating support and staff trained to provide in-person clinical intervention will not be required to be present with the individual while they are receiving services.
- The practitioner types that can provide services through telehealth will not be limited to psychiatrists, licensed psychologists, Certified Registered Nurse Practitioners and Physicians.
- Provider types that can bill for telehealth under Medical Assistance (MA) Fee-For- Service (FFS) will not be restricted to services originating from Psychiatric Outpatient Clinics, Psychiatric Partial Hospitalization Programs, and Drug & Alcohol Outpatient Clinics. BH-MCOs may continue to allow billing for any provider type they determine appropriate.
- Assistants certified in mental health; Licensed Clinical Social Workers; Licensed Professional Counselors; and Licensed Marriage and Family Therapists can use telehealth services. Other individuals providing necessary behavioral health services will be permitted to utilize telehealth for services that are within their scope of practice.



When Will the Relaxed Telehealth Rules End?

- For 90 days (est. June 15, 2020), or while the valid emergency disaster declaration is authorized by the Governor related to COVID-19 remains in effect, which ever comes first. It is likely that it may be re-issued as appropriate if emergency disaster declaration continues to be authorized by the Governor.

Additional Resources:

The Pennsylvania Department of Health (DOH) has a dedicated page for COVID-19 that provides regular updates:

- <https://www.health.pa.gov/Pages/AlertDetails.aspx>

The Pennsylvania Department of Human Services (DHS) also has a dedicated page for COVID-19. OMHSAS will ensure updates are posted to the DHS webpage:

- <https://www.dhs.pa.gov/providers/Providers/Pages/Coronavirus-2020.aspx>

Federal information on the outbreak can be located on the CDC website:

- <https://www.cdc.gov/coronavirus/2019-ncov/index.html>

Federal information specific to Medicaid Services can be located on the Center for Medicare and Medicaid Services website:

- <https://www.medicaid.gov/state-resource-center/disaster-response-toolkit/covid19/index.html>

U.S. Department of Health & Human Services also has a dedicated page for COVID-19 and resources on Telehealth

- <https://www.hhs.gov/about/news/2020/03/17/ocr-announces-notification-of-enforcement-discretion-for-telehealth-remote-communications-during-the-covid-19.html>
- <https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html>

Pennsylvania Medical Society also has a dedicated page for COVID-19.

- <https://www.pamedsoc.org/home/pamed-news/articles/BPOA-telemedicine-guidance-covid-19>

Pennsylvania Pressroom also has reports released frequently related to COVID-19.

- <https://www.media.pa.gov/Pages/State-details.aspx?newsid=375>
- https://www.media.pa.gov/Pages/DHS_details.aspx?newsid=497