

SANTA CRUZ COUNTY AVATAR INFORMATION NOTICE

TOPIC: Progress Note Templates Updated for Telehealth / Telephone

Avatar Forms, Changes and Users Affected

Date	3/1/22
Avatar Form(s)	SC General Purpose Progress Note & SC Med Service Progress Note
Changes / Updates	Telehealth & Telephone Templates
Users Affected	All Avatar Users writing Progress Notes



Summary

Avatar Progress Note Templates Updated for Telehealth and Telephone Services

MAIN POINTS:

- 1) Mental Health Plan (MHP) Telephone services do not require consent, **except for FQ providers (med support & therapy) for each session.**
- 2) DMC-ODS providers are required to obtain **one-time** client informed consent for Telephone services when providing services that would have been provided in-person prior to March 2020.
- 3) Telehealth (MHP & DMC-ODS) is now a **one-time only** consent (written consent via Telehealth consent form is best practice, documented verbal ok)

Updated Templates

"TELEHEALTH CONSENT" template located in the Client Presentation section of the SC General Purpose and SC Med Service Progress Note has been updated and now states: **The client consents to services via telehealth and is aware of the benefits, risks, limitations, and alternatives to telehealth services. The Informed Consent for Telehealth Services form was reviewed with the client by this clinician in today's session. Client has verbally agreed prior to delivering telehealth services.**

"TELEPHONE CONSENT" template located in the Client Presentation section of the SC General Purpose and SC Med Service Progress Note has been updated and now states: **The client verbally consents to services via telephone and is aware of the benefits, risks, limitations, and alternatives to telephone services. The provider reviewed with the client that**

receipt of services via the telephone is a non-visual connection with the provider. The provider will do their best to provide the service, despite the in-ability to provide a live in-person or telehealth examination. There are documented circumstances involved that prevent the visit from being conducted face-to-face, or via telehealth, such as the patient is quarantined at home due to illness, local or state guidelines direct that the patient remain at home, the patient does not have reliable access to the internet, or the internet does not support Health Insurance Portability and Accountability Act (HIPAA) compliance. Client has verbally agreed prior to delivering telephone services.

Why were these changes made?

In May 2020, during the start of the COVID-19 pandemic response, templates were added to Avatar Progress Notes to indicate client informed consent for Telehealth and Telephone services (Santa Cruz County Avatar Information Notice dated 5/12/2020).

In September 2021, Santa Cruz County Behavioral Health released *QI MEMO #5 [9/13/2021] Department of Health Care Services Notice: KEY COVID Emergency Flexibilities Changes*, which updated processes for **Telehealth** service consent:

- **Requirement (FAQ 9/13/21):** Provider to obtain client wet or electronic signature (via hard copy or DocuSign) for consent to on-going Telehealth services. Best practice guidance = obtain written consent on the telehealth consent form and have this consent scanned into the chart. Consent form can be found here: [Client Information \(santacruzhealth.org\)](https://www.santacruzhealth.org)
To have the document scanned into the chart, send via email to: hsabhddataclerks@santacruzcounty.us
- **Explanation (FAQ 9/13/21):** Provider no longer needs to obtain service consent for **each** telehealth service. If unable to obtain written consent, one-time consent documented in a progress note in the client file is now acceptable for consent to telehealth visits.
- **Client Refusal or Unable to Sign Informed Consent (FAQ 9/13/2):** One-time documented verbal consent is sufficient. The provider should pursue client wet or electronic signature (via hard copy or DocuSign) during subsequent client contact.

In addition, there are updated processes for **Telephone** service consent:

- FQ (med support and therapy) Providers must obtain service consent for **each** telephone service documented in a progress note.
- DMC-ODS Providers need to obtain **one-time** consent for telephone services documented in a progress note.

Additional Clarifications for Phone Consent as of February 2022:

- Short Doyle / Medi-Cal Mental Health providers are not required to document client informed consent for Telephone services (same as before the pandemic).

- FQHC providers are required to obtain client informed consent for Telephone services as prior to State-authorized pandemic exceptions, billable services were required to be completed face-to-face (both medication support and therapy).
- DMC-ODS providers are required to obtain client informed consent for Telephone services when providing services that would have been provided in-person prior to March 2020.

For More Information Contact

The QI help desk at askqi@santacruzcounty.us

This notice will be added to the Santa Cruz County Avatar WebPage soon.

The easy way to get to the web page is to type Avatar into the Search Forms blank when you are in Avatar. Click on Avatar Resources and this will launch the web page.

