

**Santa Cruz County Behavioral Health - QI MEMO
Telehealth & Phone Services –
UPDATES & Volume 4 FAQ's
COVID-19 - 5.8.2020**



First off: Thank you for your excellent work!

As Shelter in Place continues, and we all continue to make adjustments in our personal and professional lives due to COVID-19, we are so impressed, thankful and proud of your hard work and dedication as you support others.

Please NOTE: If you need support providing services and/or with documentation:

- FIRST: Consult your Supervisor
- If you still need support, email your question to: askQI@santacruzcounty.us
Please put "COVID-19 Response Question" in the subject line of your email

ADDITIONAL UPDATES / CHANGES from FAQ 1st & 2nd Volumes

MHP & DMC-ODS:

Q: How do I get client consent for treatment, consent to participate in group counseling services, acknowledgment of notice of privacy practices, consent to release medical records or consent to release information (ROI)?

A: If an in-person visit is not possible to obtain written signatures, and use of encrypted email is not possible, clinicians should document that verbal consent was obtained in the medical record. **As soon as possible**, written consent in the form of a signature from the client should be obtained (via encrypted email, a picture of a pdf that can be scanned in the chart or in-person when safe).

DocuSign forms, including consent forms, are **still pending**.

The Telehealth consent form has been completed in both English and Spanish. The form(s) are now available on-line here (right side of the page, "Information" box):

<http://www.santacruzhealth.org/HSAHome/HSADivisions/BehavioralHealth.aspx>

Q: If I obtain written consent (a wet signature) on the new Telehealth consent form, do I have to continue to document in each progress note that the client consented to Telehealth services?

A: No. Once the signed Telehealth consent form is scanned into avatar, the client has provided standing consent for Telehealth services. The clinician should document once in a progress note that written, informed consent for Telehealth services has been obtained and scanned into the medical record (as is our common practice for consent for treatment at the onset of services).

Q: How do I document in each progress note that the client consented to a Telephone or Telehealth service?

A: New templates have been added to individual progress notes to help document that the client has verbally consented to Telephone or Telehealth services. The Avatar Information Notice regarding this update will go out via email the week of 5/11-5/20/20 and will be available here:

[http://www.santacruzhealth.org/HSAHome/HSADivisions/BehavioralHealth/AvatarResources/AvatarInformationNotices\(Updates\).aspx](http://www.santacruzhealth.org/HSAHome/HSADivisions/BehavioralHealth/AvatarResources/AvatarInformationNotices(Updates).aspx)

Q: How do I get consent for medication for a client who is already under my care / an established client?

A: If an in-person visit is not possible to obtain written signatures, and use of encrypted email is not possible, a provider may obtain verbal ***informed*** consent via telehealth or telephone and document this in the medical record. This includes all controlled substances, including buprenorphine.

Q: How do I get consent for medication for a client who is new to my care?

A: If an in-person visit is not possible to obtain written signatures, and use of encrypted email is not possible, a provider may obtain verbal ***informed*** consent via telehealth or telephone and document this in the medical record for **NON-CONTROLLED substances and buprenorphine**. Prescriptions for **ALL other controlled substances** can only be done via telehealth or in-person for new clients.

UPDATE / CHANGES from FAQ 3rd Volume 4.20.20:

Since the time QI sent our original guidance, DHCS has provided information that clarifies phone service billing:

Q: How do I document Telephone services?

A: For ALL providers (MHP, DMC-ODS, FQ):

- Use “Phone” as the Location Code
- Use the service code that matches the service provided.
- Time on the phone in contact with the client is documented as “Face-to-Face” time.
- Documentation time is documented as “Other” time.
- DMC-ODS: Document the Start and End time of the phone session and the Start and End time of documentation time in the Presentation field.

As this is a recent clarification from DHCS, notes already completed do ***not*** need to be changed.

New FAQ 4th Volume 5.8.20:

Q: Are services provided to assist clients in utilizing Telehealth billable as Case Management?

A: Yes, during the COVID 19 health emergency shelter-in-place order, when clients must utilize alternative means to access behavioral health services, a clinician, **acting in their scope of practice**, may

claim case management for providing support to access needed Behavioral Health Services via Telehealth **if the client could not access such services without assistance.**

- The documentation of the service must state that the case management service is being provided as the client requires support to access behavioral health services through alternative means due to COVID-19 restrictions.
- Documentation must include that without accessing services, the client is at risk of decreased functioning, increased symptomology, or relapse; whichever is appropriate for the client's situation.
- Case Management is ***not*** assisting the client with accessing Telehealth if the client is self-sufficient or has become self-sufficient.

REMINDERS / COMING SOON:

- QI put out an Information Notice 5/4/20 regarding Obtaining **Client Approval to Leave a Confidential Message**. Please review and follow. The notice can be found here:

[http://www.santacruzhealth.org/HSAHome/HSADivisions/BehavioralHealth/AvatarResources/AvatarInformationNotices\(Updates\).aspx](http://www.santacruzhealth.org/HSAHome/HSADivisions/BehavioralHealth/AvatarResources/AvatarInformationNotices(Updates).aspx)

- Information Notice coming soon (week of 5/11-5/15/20) regarding templates to support clinicians with documentation of client consent to Telephone and Telehealth services (See page 1 of this FAQ). This notice will also be found at the above link.

RESOURCES:

DHCS COVID-19 website: <https://www.dhcs.ca.gov/Pages/DHCS-COVID%E2%80%91Response.aspx>

County of Santa Cruz Health Services Agency COVID-19 website:

<https://www.santacruzhealth.org/HSAHome/HSADivisions/PublicHealth/CommunicableDiseaseControl/CoronavirusHome/ProviderGuidance.aspx>
