Framework for Implementation of Telehealth Services in a Behavioral Health Setting in a Short Time Frame

April 2020
Purpose and Acknowledgements

The recent COVID-19 health pandemic has accelerated the implementation of behavioral health services via remote technology, including telephone and video conferencing. The following is an implementation framework for behavioral health care providers that guides organizational leadership through short term practical steps for implementation of remote services via technology while including successful long-term strategies for sustaining telehealth services.

This document resulted from discussions between behavioral health providers from Oklahoma tribal communities, the Oklahoma Department of Mental Health and Substance Abuse Services, the SAMHSA Region 6 Administrator, the Oklahoma City Area Indian Health Service and the South Southwest Addiction Technology Transfer Center in March 2020. Collaborative partners Mountain Plains ATTC and NFARtec provided support and input into the development of this framework.

For additional resources to guide the provision of behavioral health services via technology, see the Resources Section of this document.

For additional information or comments, contact the South Southwest Addiction Technology Transfer Center at southsouthwest@attcnetwork.org
**Action Item 1: Participant Interest and Capacity**

Connect via telephone or in-person with individuals on existing caseloads to determine individual preference and ability to participate in telehealth services.

**Questions for individual receiving services:**

1. Does the individual choose to receive services via their phone or computer at this time?

   If no, discuss other options available to individual to support their wellness and/or treatment plan. Provide referrals and connection to alternate services, if applicable.

   Encourage them to reach out to organization and other available supports if needed, and provide specific contact information.

   Make note to connect at a future time to check in with the individual to support their wellness and ascertain if they have accessed needed services, and to see if the individual has a need for telehealth services at the time.

2. Does the individual have a telephone?

   If yes, is it a landline or mobile phone?

   If yes, is it their own phone or do they share it with others?

3. Does the individual have access to WIFI services?

   If yes, is the WIFI available somewhere private or do they rely on public WIFI (library, coffee shop, school etc.)?
4. Does the individual have a mobile device(s) – tablet or smart phone?
   If yes, what kind?
   If yes, do they rely on WIFI or a phone data plan to connect their mobile device(s) to the internet?
   If WIFI, public or private?

5. Does the individual have a computer?
   If yes, what kind?
   If yes, do they use it to connect to the internet?
   If yes, does the computer have?
   • Camera
   • Microphone
   • Speakers

Next Steps:
Timeline:
Staff Person(s) Responsible:
Action Item 2: Platforms

Compare possible telehealth platforms and decide which will be utilized.

Some options include, but are not limited to:
1. Zoom.us
2. Doxy.me
3. RealPresence
4. Microsoft Teams

<table>
<thead>
<tr>
<th>Consideration</th>
<th>Platform A</th>
<th>Platform B</th>
<th>Platform C</th>
<th>Platform D</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cost</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>HIPAA Compliance</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Business Associate Agreement for HIPAA</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>End-to-End Encryption</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Waiting Room Function For Online Session</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ease of use by participants</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ease of set up by provider and participant</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Feedback from Other Behavioral Health Providers</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Next Steps:
Timeline:
Staff Person(s) Responsible:
**Action Item 3: Patient Safety and Privacy**

Determine how to best protect your patients as you implement telehealth services in this time of public health crisis and in the long term.

**Steps:**

1. Revise your consents to incorporate changes related to telehealth.

2. Develop procedures and best practices related to safety and privacy that comply with:
   - HIPAA
   - Federal confidentiality rules and regulations 42 CFR Part 2
   - Ethical standards of practice

Some examples might include, but are not limited to:

- Ensure both the staff and patient are trained on using the hardware and the video conferencing system and there are opportunities to practice. Ensure procedures are in place to maintain privacy prior to the start of the first telehealth session.

- Maintain up to date emergency contact information for individual receiving services. Identify emergency contacts that are in geographical proximity to the individual.

- At the start of each session, ask participant for a phone number where they may be reached if the video technology drops or fails.

---

1 Mountain Plains Addiction Technology Transfer Center (2020) *Where to Begin... Essential Tips for Using Videoconferencing to Deliver SUD Treatment and Recovery Services Webinar* Presenters: Sandnes S. Boulanger, LCSW, MCAP, Clinical Director, Operation PAR, Inc. and Maryellen Evers, LCSW, CAADC Downloaded on April 21, 2020.
• At the start of each session, ask the individual being served to identify the address where they are physically located so you can call an emergency contact, crisis team or 911 if needed.

• At the start of each session, ask the individual being served who else is in the room with them.

• Develop a safety phrase the individual being served can use to let you know now is not a time where they can participate in a session, “The grocery stores have been really busy this week.” Staff can then respond with “I have had an emergency come up and I need to reschedule our session today.” Utilize a different phrase to indicate if they need you to send help.

• Establish policies and procedures for use of text messaging and email with individuals being served.

• Consider use of patient portal systems designed to protect communication with patients.

• Never record or upload a recording of a telehealth session.

Next Steps:
Timeline:
Staff Person(s) Responsible:
**Action Item 4: Staff Preparation and Training**

Survey staff to determine types and extent of support needed from leadership for implementation of telehealth services and prepare staff for the transition.

**Questions:**

1. What are staff needs and concerns about telehealth implementation and how will we address them?

2. When and how will we prepare staff to implement telehealth services?

3. What specific training and ongoing support do they need to build skills and comfort with the new processes and technology?

4. How will we maintain ongoing feedback and communication with staff as the new processes are implemented?

**Next Steps:**

**Timeline:**

**Staff Person(s) Responsible:**
Action Item 5: Policies and Procedures

Review and modify agency policies and procedures.

Questions:

1. What existing policies impede immediate implementation of telehealth services?

2. How will we modify them?

3. Will changes have an expiration date?

4. What policies and procedures are missing and need to be added?

5. How will we update staff on policies and procedures?

Next Steps:

Timeline:

Staff Person(s) Responsible:
Action Item 6: Work Flow

Review workflow of specific programs and adjust details of workflow as needed.

Steps:

1. Determine which services will be provided via telehealth, by which staff and to which individuals.

2. Document steps currently taken to interact with individuals being served using each of these services.
   
   How will we modify these steps to utilize telehealth?
   
   Will changes have an expiration date?
   
   What policies and procedures need to be modified or added to support this workflow?

3. What community and cultural considerations need to be taken into account and how will they adjust the workflow?

4. What are the agency procedures for supervision of staff providing telehealth services?

5. How will staff document the remote services?

Next Steps:

Timeline:

Staff Person(s) Responsible:
Action Item 7: Staff Resources

Inventory and augment staff resources needed for telehealth.

Steps:

1. Do staff have needed equipment?
   - Mobile devices
   - Access to WIFI or data plan
   - Computer with camera, microphone and speakers
   - IT support for when things go wrong

2. How much will it cost to provide all needed equipment and support?

Next Steps:
Timeline:
Staff Person(s) Responsible:
Action Item 8: Reimbursement

Determine how program will receive payment for telehealth services.

Questions:

1. Will current funders pay for services delivered via phone or videoconferencing?
   - In the short term due to public health crisis?
   - In the long term?

2. What are the billing procedures/codes for billing telehealth?

3. What documentation is required by funders for billing services provided via telehealth?

4. Does your program collect fees or co-pays from individuals receiving services?
   - If yes, how will you do so virtually?
   - Is the payment platform secure/HIPAA compliant?
   - Note: Venmo and Pay Pal are not.

Next Steps:

Timeline:

Staff Person(s) Responsible:
Additional Resources

Addiction Technology Transfer Center, National Coordinating Office, Pandemic Response Resources: https://attcnetwork.org/centers/global-attc/pandemic-response-resources


Tips for Using Videoconferencing to Deliver SUD and Treatment and Recovery Services https://attcnetwork.org/centers/mountain-plains-attc/tips-using-videoconferencing-deliver-sud-treatment-and-recovery


National Frontier and Rural Telehealth Education Center (NFARtec) https://www.nfartec.org/

National Consortium of Telehealth Resource Centers https://www.telehealthresourcecenter.org/resources/

Center for Excellence for Protected Health Information https://www.samhsa.gov/national-center-excellence-protected-health-information

SAMHSA Tip 60: Using Technology-Based Therapeutic Tools in Behavioral Health Services