

Health Home Telehealth Guidance

Using HIPAA compliant audio-visual telehealth in Health Home



Definitions for the purpose of this guidance document

- **Telehealth:** A HIPAA-Compliant Audio-Visual platform.
- **HIPAA-compliant audio-visual platform:** An audio/visual technology platform that complies with HIPAA Rules to safeguard a client's protected health information (PHI).
- **HIPAA Rules:** The Privacy, Security, Breach Notification, and Enforcement Rules at 45 C.F.R Part 160 and Part 164.

General Guidelines

- The Health Home program was designed as an in-person model. Any use of telehealth should be based on client choice and documented.
- When conducting telehealth services, it is important for the Health Home Care Coordinator (HHCC) to establish a professional relationship in the same manner as a traditional in-person visit with the same standards.
- Prior to using telehealth, alternative locations may be explored with the client as an option that would maintain in-person interaction, such as seeing the client in the community, if not at their home. This includes doctors' appointments, other appointments, community services, resources, and more.
- Telehealth may be used monthly but is not recommended for Health Action Plan (HAP) visits.
- The HHCC should continue to follow the current Tiers Guidance when moving clients from Tier Two to Tier Three.
- Leads should explore options when clients do not have the appropriate technology available, accessibility to the resources, or when location does not allow for consistent web access.
- The HHCC and client should communicate about a back-up plan in the event the technology fails.

Informed consent

- The HHCC must confirm and document that informed consent has been obtained with any client who has decided to receive services via telehealth.
- Leads should develop materials, and provide training, to CCOs in their network on best practices and documentation around providing services via telehealth in alignment with HCA guidance. This includes but is not limited to:
 - Explaining to the client their rights and options for delivery (for example, in home, community, or via telehealth).
 - Explaining to the client the potential risks and benefits of each option.
 - Informing the client, they may want to be in a room or space where privacy can be preserved during the conversation and that PHI may be disclosed otherwise.
 - Verifying the client has consented to telehealth at the beginning of each session.
 - Informing clients of the HHCCs location and obtain the location of the client.
 - Notifying, and obtaining consent, if there is anyone observing the visit.

Tier one

- The Initial HAP (Tier One) will be in-person.
- Per Contract, the HHCC meets in-person with each Beneficiary at the Beneficiary's choice of location to explain, develop, and complete the HAP.

Documentation

- The HHCC must confirm and document informed consent for telehealth has been obtained.
- All other Health Home documentation standards continue to apply.
- The HHCC will document:
 - The delivery methods explored (for example, in home, community, or via telehealth).
 - The HIPAA-compliant platform used.
 - All who attended the telehealth visit.
- The HHCC will revisit the use of telehealth with a client, at a minimum, with each HAP visit and will document that discussion.

Reporting

- Telehealth visits will be tracked and reported to the state through the Place of Service Code.
- The count of HAPs completed via telehealth will be reported to the state through a process to be determined by Leads.
- Guidance will be evaluated in one year.

Other considerations and resources

- Consider the client's resources when deciding the best platform to provide telehealth services.
 - A client's cellphone may have limited data.
- A Provider can request a video remote interpreter.
 - The HCA HH website has the necessary information hca.wa.gov/billers-providers-partners/program-information-providers/interpreter-services-providers
 - Interpreter must never be alone with client, even on video.
 - The provider (CCO/Leads) provides the platform.
 - The meeting must be scheduled in advance. No "on demand" visits.
- Clients receiving long-term services and support should work with their case manager on potential assistive technology funds available to access a tablet or smartphone.
 - Low-cost internet benefit for Apple Health (Medicaid) recipients.
 - Affordable Connectivity Program low cost internet: fcc.gov/acp
 - affordableconnectivity.gov/do-i-qualify/