

Alcohol and Drug Abuse Division (ADAD)

Telehealth Guidance

November 2020

Telehealth technology is a useful tool to help deliver needed services by Certified Substance Abuse Counselors (CSAC), Certified Prevention Specialists (CPS), and other credentialed substance abuse addiction professionals to clients and participants in remote areas when travel and the need to maintain social distancing makes face-to-face (FTF) service delivery impractical.

Resources:

- ASAM. [Supporting Access to Telehealth for Addiction Services: Regulatory Overview and General Practice Considerations](#). September 18, 2020.

Substance-based addiction services conducted by telehealth shall be consistent with Section 453-1.3, Practice of Telehealth, Hawaii Revised Statutes (HRS) as affected by the Governor's Proclamations Related to the COVID-19 Emergency, Substance Abuse Mental Health Services Administration (SAMHSA) regulations, State of Hawaii regulations and guidelines, and Med-QUEST guidelines. In addition, per federal COVID-19 Emergency Response guidelines, under the medical emergency exception of 42 CFR Part 2, providers of substance-based addiction services may make their own determinations on whether a bona fide medical emergency exists for purposes of providing needed treatment to patients.

Resources:

- SAMHSA. [COVID-19 Public Health Emergency Response and 42 CFR Part 2 Guidance](#). March 19, 2020.
- Office of the Governor, State of Hawaii. [Proclamations Related to the COVID-19 Emergency](#). Continues suspension of some state laws regulating telehealth.
- [Section 453-1.3, Practice of Telehealth, HRS](#).

The adoption of telehealth may be utilized if both of the following conditions are met:

1. Substance-based addiction providers should have policies and procedures for the use of telehealth related to their scope of practice, including training in service delivery through telehealth.
2. Substance-based addiction clients and participants should agree to the use of telehealth services and have the necessary equipment and telecommunications services.

Resources:

- State of Hawaii Department of Health. BHHSURG. [COVID-19 Guidance for Behavioral Health and Homelessness Care Providers \(NOTE: Click "Telehealth Guidance" to Expand\)](#). June 30, 2020.
- _____. _____. [Telehealth Decision Tree](#). March 27, 2020.
- _____. _____. [How Clients/Consumers Can Prepare for Telehealth Sessions](#). October 7, 2020.
- University of Hawaii. Center for Cognitive Behavioral Therapy. [How to Maximize Engagement during Telehealth Sessions with Clients](#). April 23, 2020.

- U.S. Department of Health & Human Services. [Notification of Enforcement Discretion for Telehealth Remote Communications During the COVID-19 Nationwide Public Health Emergency](#). March 30, 2020. Briefly, during the COVID-19 nationwide public health emergency, providers can use any non-public facing remote communication tool (Zoom, FaceTime, Skype) to communicate with patients to provide telehealth without the risk that OCR might seek to impose a penalty for non-compliance with the HIPAA Rules related to the good faith provision of telehealth during the COVID-19 nationwide public health emergency. Providers should notify patients that these third-party applications potentially introduce privacy risks, and providers should enable all available encryption and privacy modes when using such applications.
- _____. [FAQs on Telehealth and HIPAA During the COVID-19 Nationwide Public Health Emergency](#).
- ASAM. [How to Maximize Access and Participation in Support Groups and Recovery Activities to Mitigate risk of COVID-19 Transmission](#). April 14, 2020.

Substance-based addiction service providers shall take necessary precautions for staff and clients/participants for FTF services, such as:

1. Policies and procedures on the purchase and use of personal protective equipment (PPE).
2. Adoption of Grey Zones within facilities to screen clients/participants for COVID-19 symptoms, including temperature checks.
3. Routine screening of staff for COVID-19 symptoms and procedures for testing and quarantine if found symptomatic.

Resources:

- State of Hawaii Department of Health. BHHSURG. [COVID-19 Guidance for Behavioral Health and Homelessness Care Providers \(NOTE: Click “Implementing Infection Control Measures” to Expand\)](#). June 30, 2020.
- _____. [PPE Decision Tree](#). April 10, 2020.
- _____. [BHHSURG Support and Supply Form for Organizations Needing PPE](#).
- _____. [Reopening Guidelines for Behavioral Health and Homelessness Care Providers](#). [Complete PDF Reopening Guidelines](#) also available. June 15, 2020.

Telehealth service delivery shall be clinically appropriate as evidenced by the clinician’s approval through incorporation of telehealth on the client’s health and wellness plan (HWP). Clinicians may modify the plan for telehealth use based on service effectiveness or outcomes. Some aspects of the HWP may be better suited to the use of telehealth than others.

Substance-based addiction service providers should discuss the use of telehealth with clients and participants. Preferably, this discussion should occur prior to initial intake of new clients. The client’s clinical team, including any care coordination staff and clinical director, should be aware of the HWP and any subsequent updates to the HWP that involve changes in the use of telehealth.

Resources:

- State of Hawaii Department of Health. Alcohol and Drug Abuse Division. [Adding Health and Wellness Plan](#). April 1, 2018.

- _____. _____. [Hawaii CARES Consent Form](#). September 20, 2019.
- _____. _____. [Hawaii Coordinated Access Resource Entry System \(CARES\) home page](#).

Technical aspects for ADAD-contracted agencies wishing to provide services via telehealth are as follows:

1. Use a single platform for telehealth services delivered by the agency (examples: Zoom, Microsoft Teams) that is both Health Insurance Portability and Accountability Act of 1996 (HIPAA)-compliant and 42 CFR Part 2-compliant. A secure platform that follows current National Institute of Standards and Technology (NIST) guidelines (for example, NIST 800-53 Rev. 5 guidelines were released on Sept. 2020) is required.
2. The platform shall allow full-screen bidirectional video and audio communication.
3. Sign a Business Associate Agreement (BAA) with the telehealth platform provider. Copies of this BAA and technical service details shall be provided to ADAD upon request.
4. Provide staff training and support in equipment and platform utilization.
5. Providers should also consider supplying their technical equipment or communication services to clients or participants for telehealth purposes.

Resources:

- U.S. Department of Health & Human Services. [Notification of Enforcement Discretion for Telehealth Remote Communications During the COVID-19 Nationwide Public Health Emergency](#). March 30, 2020.
- _____. [FAQs on Telehealth and HIPAA During the COVID-19 Nationwide Public Health Emergency](#).
- ASAM. [COVID-19 Resources Home Page](#).
- Pacific Basin Telehealth Resource Center. [Telehealth Resources for COVID-19](#).

ADAD-contracted providers may use standard billing codes as provided by contract, including the use of telehealth place-of-service codes (e.g. “02”) in ADAD’s designated health records system when (1) billing ADAD for services using telehealth, and (2) using telehealth modifiers within the client’s progress notes. For services covered through Medicaid, providers must follow Med-QUEST guidelines for billing telehealth, including the use of telehealth modifiers (e.g. “95”) where necessary.

Resources:

- State of Hawaii Department of Health. Alcohol and Drug Abuse Division. [Selecting Service Location on ADAD-Funded Telehealth Encounter](#). August 26, 2020.
- State of Hawaii Department of Human Services. Med-QUEST Division. [Telehealth Guidance for Public Health Emergency - Telephonic Services and Services Billable by Qualified Non-Physician Health Care Professionals](#). April 15, 2020.
- _____. _____. [Telehealth Guidance for Federally Qualified Health Centers](#). March 16, 2020.
- _____. _____. [Telehealth Law \(Act 226, SLH 2016\) Implementation and Attachment A](#). May 2, 2017.
- HMSA. [COVID-19 Coding Guide](#). April 6, 2020.
- United Healthcare. [Telehealth Services Care Provider Coding Guidance](#). June 25, 2020.