



**STATE OF HAWAII**  
**DEPARTMENT OF HEALTH**  
**CHILD AND ADOLESCENT MENTAL HEALTH DIVISION**  
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HONOLULU, HAWAII 96816

In reply, please refer to:  
File:

March 19, 2020

TO: Contracted Provider  
Via E-Mail

**Telehealth/Phone Calls**

Q. 1 .I have a question about the phone call explanation in this letter. Since the teal book has been in place we can bill for phone call when a parent calls MHP or client calls MHP correct? We can NOT bill for collateral contacts correct? Based on this letter I understand that we should do our best to NOT have phone sessions but do more telehealth which is considered same as face to face session.

A. 1. Answer: This does seem to comport with previous guidance from the Teal Book. We are encouraging televideo sessions as these are definitively approved and reimbursable. There currently **are** times when phone calls with families are reimbursable. There currently are **no** times we are aware of when collateral calls without the family/client are reimbursable.

Q. 2. Is there a simple way you to explain when we can bill for a phone call?

A. 2 Answer: This is a complicated topic and we plan to issue more guidance in the future after the COVID-19 crisis to help providers understand the rules around this better. Until then, please use telehealth when you can. When you can't, please focus on providing good patient care in the safest way possible.

**Q. 3. What Are the Acceptable Platforms That are HIPAA Compliant for Telehealth?**

**Acceptable HIPAA Compliant Platforms for Telehealth**

A. 3.

For clarification on Secure video services for telehealth, it is CAMHD's standard to use a secure platform that is under a HIPAA BAA with the service provider. For example the DOH has a BAA covering services for telehealth via Zoom. We are most concerned about providing services to youth in this time of crisis.

Using: Zoom, Teams, Webex, GoToMeeting, Vidyo, and similar services is permitted, under a signed BAA with the service and encrypted settings configured. Under CAMHD contracts the requirement is for all therapists in one provider agency to use one standard platform. This is for training & ensuring all therapists support youth and families the same way in telehealth.

As an added clarification on a temporary basis during this Covid19 crisis, CMS issued further guidance that Facetime and Skype may be permitted at the present time, however not permanently.

Please reference :

<https://www.hhs.gov/sites/default/files/hipaa-and-covid-19-limited-hipaa-waiver-bulletin-508.pdf>

<https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/index.html>

<https://www.cms.gov/newsroom/fact-sheets/medicare-telemedicine-health-care-provider-fact-sheet>

Sincerely,

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CAMHD Medical Director  
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