

Date: September 26, 2019
CYF Memo: #12 -19/20
To: CYF Telehealth Services
Mental Health (MH) and Substance Use Disorder (SUD) Treatment Providers
From: Yael Koenig, CYF Deputy Director
Re: **Telehealth Services**

In an effort to support programs opting to utilize telehealth service, BHS QI and BHS CYF provided implementation and compliance guidance, and tracking templates via MSR/QSR reporting, respectively. This Memo serves as a summary of the key implementation components and tracking procedures that programs follow if providing telehealth services:

- **COR notification** – All programs wanting to establish telehealth services are to submit a written plan/procedure outlining the program protocols prior to implementation. Programs that are already using telehealth, are to submit their existing written plan/procedure.
 - Elements of the brief plan/procedures include items such as: funding, confidentiality compliance, utilization parameters, adherence to client choice, etc.
- **Program tracking and reporting** – A report template is available via Cerner Community Behavioral Health (CCBH) to document current program telehealth utilization data on MSR/QSR. *Telehealth Services Report Template*.
 - The data from the Telehealth Services Report Template is pulled directly from the dropdown options selected by staff completing data entry. Program runs the report at the end of the applicable month/quarter, reviews report outcomes, and addresses any data entry errors or staff training needs as per standard protocols pertaining to CCBH data clean-up. The report can be run as often as needed for program monitoring.
 - CYF review of FY1819 telehealth reports indicates that one of the most common data entry reporting errors is by contact type; indicating telephone verses telehealth and/or vice versa in the dropdown.
- **Guidelines for Contracted Telehealth/Videoconferencing** – BHS QI MIS Memo issued 2019.05.10 outlines guidelines for videoconferencing services.
- **Annual Attestation** – Program, per BHS QI MIS Memo issued 2019.05.10, submits an annual attestation statement to COR/COR Teams to attest to appropriate levels of HIPPA compliance.

Please contact your Contracting Officer Representative (COR) with any questions.

Attachments: County of San Diego, BHS, QI MIS memo – Issued 2019.05.10
Telehealth Services Report Template – Instruction Sheet
CYF MSR/QSR Telehealth Services Tab

Cc: County of San Diego Quality Management (QM)
County of San Diego Clinical Directors Office (CDO)

To: Contracted Providers Offering Telepsychiatry Services

Date: May 10, 2019

From: AnnLouise Conlow, BHS Senior MIS Manager

Re: Videoconferencing Guidelines for Contracted Telepsychiatry Providers Connecting to their own Network – Updated for clarity

Telepsychiatry providers now have the option to provide and manage their own videoconferencing equipment and applications. Contracted providers should select videoconferencing applications that have the appropriate verification, confidentiality, and security parameters necessary to be properly used for this purpose and comply with Article 14 of their contracts. Please see additional information below related to videoconferencing guidelines and recommendations for your reference.

Use a secure, trusted platform for videoconferencing.

Choose a software solution that is HIPAA-compliant, as many popular, free products are not. Compliance with HIPAA (Health Insurance Portability and Accountability Act of 1996) is essential. HIPAA sets a minimum federal standard for the security of health information.

It is recommended to use a broadband internet connection that, at minimum, has a transmission speed of at least 5 MB upload/download to avoid pixilation, frequent buffering, and other video and audio difficulties associated with slow and insufficient transmission. Higher speeds might be required for newer technologies that use HD capabilities.

When reviewing software options, you will notice that many vendors require a “business associate agreement,” or a BAA, to ensure HIPAA compliance. Contact the vendor and confirm what such an agreement entails.

Telepsychiatry providers will submit an annual attestation statement to their Contracting Officer Representatives (CORs) that shall include compliance with the following:

Verify your devices and software use the latest security patches and updates. Install the latest antivirus, anti-malware, and firewall software to your devices. The underlying network must provide security.

Verify your device uses security features such as passphrases and two-factor authentication. Your device preferably will not store any patient data locally, but if it must, it should be encrypted.

Verify your audio and video transmission is encrypted. The Federal Information Processing Standard (FIPS) 140-2 is used by the United States government to accredit encryption standards. Encryption strengths and types can change. When partnering with 3rd party telepsychiatry vendors, verify if their encryption meets the FIPS 140-2

**Behavioral Health Services
QUALITY IMPROVEMENT – MIS MEMO**

certified 128 bit standard as required by Article 14 within County of San Diego contracts (256 bit standard is recommended by the American Psychiatric Association – APA, but your COR will check for at least 128 bit).

Verify that any peer-to-peer videoconferencing (streamed endpoint-to-endpoint) is not stored or intercepted by the company in any way; and that any recorded videoconferences or—if available—text-based chat sessions near the chat window are stored locally, on your own HIPAA-compliant device or electronic record keeping system, in order to safeguard any electronic protected health information or PHI.

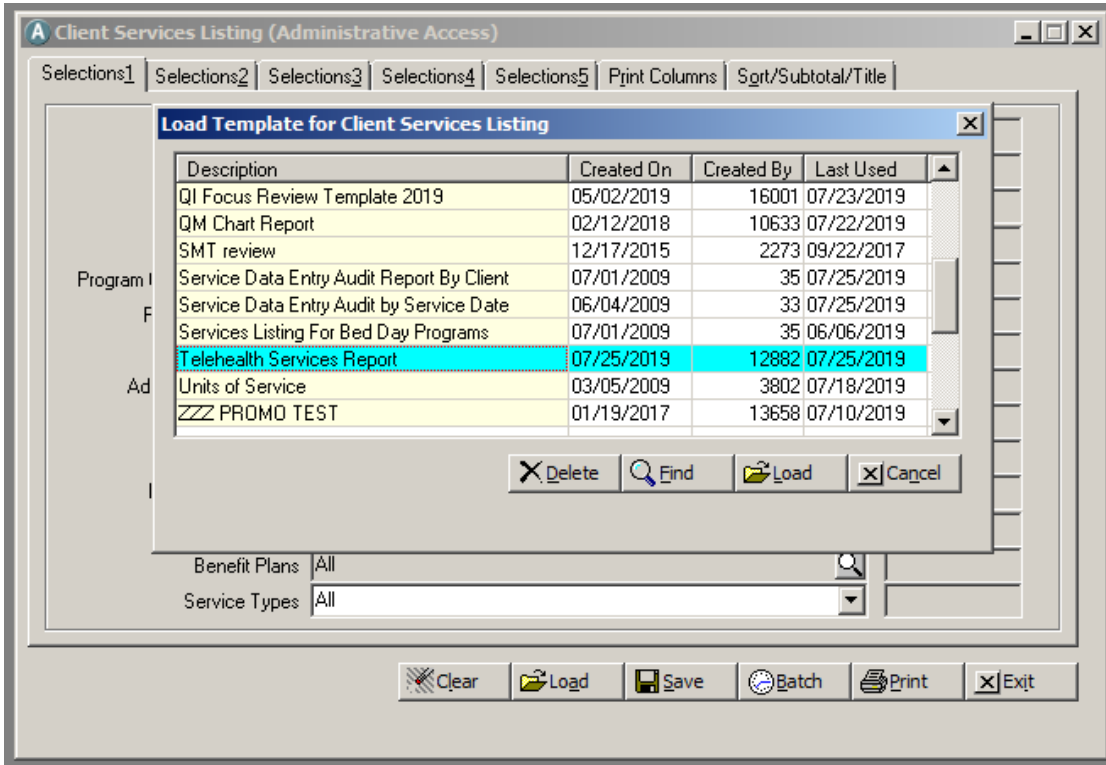
Kindest regards,

AnnLouise Conlow

Annlouise.conlow@sdcounty.ca.gov

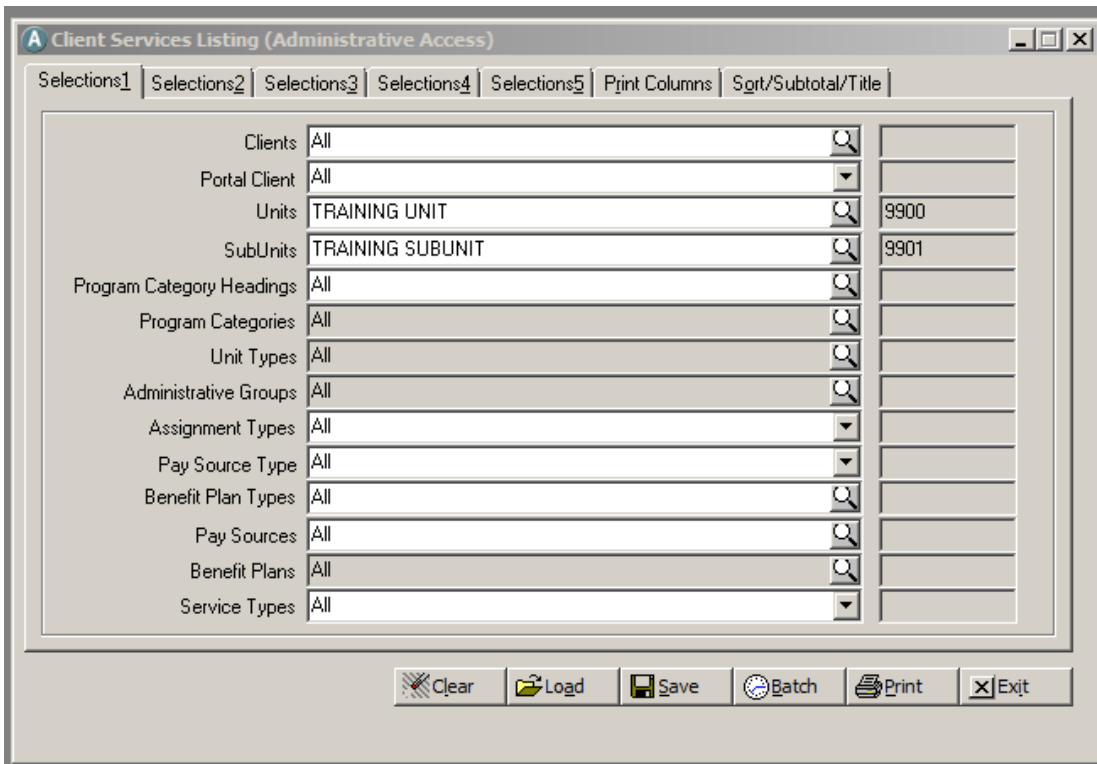
Open the Client Services Listing Report in Cerner

Click Load and select the Telehealth Services Report template



Selections_1

Enter Unit/Subunit



Selections_2

No action required

The screenshot shows the 'Client Services Listing (Administrative Access)' window with the 'Selections_2' tab selected. The window contains a list of filter criteria, each with a text input field and a search icon. The 'Excluded Services' field is a dropdown menu. At the bottom, there is a toolbar with buttons for Clear, Load, Save, Batch, Print, and Exit.

Field	Value
Client ZIP	All
Counties of Residence	All
Address Counties	All
Referral Source	All
Races	All
Client Category	All
Priority Pop Types	All
SMI/SED Status	All
Diagnostic Category	All
Credentials	All
Servers	All
Service Codes	All
Excluded Services	None

Selections_3

Enter service dates

The screenshot shows the 'Client Services Listing (Administrative Access)' window with the 'Selections_3' tab selected. The window contains a list of filter criteria, each with a text input field and a search icon. The 'Service Dates' and 'Date Entered' fields include date pickers. At the bottom, there is a toolbar with buttons for Clear, Load, Save, Batch, Print, and Exit.

Field	Value
Service Category A	All
Service Category B	All
Units of Measure	All
Persons Contacted	All
Places of Service	All
Outside Facility	All
Contact Types	Telehealth
Appointment Types	1,2
Billing Types	All
Service Intensities	All
Entry Screen Types	All
Data Entered By	All
Service Dates	07/01/2019 thru 07/01/2019
Date Entered	// thru //

Selections_4

No action required

Client Services Listing (Administrative Access)

Selections1 | Selections2 | Selections3 | **Selections4** | Selections5 | Print Columns | Sgrt/Subtotal/Title

Include Only 'New' Clients
 Include only Clients with Consecutive Days of Services?
Number of Consecutive Days of Services:

Assignments with or without a Home Provider: All With WithOut

Home Provider	All	<input type="text"/>
Home Provider Type	All	<input type="text"/>
Modes of Service	All	<input type="text"/>
Service Functions	All	<input type="text"/>
Assignment Categories	All	<input type="text"/>
Primary Servers	All	<input type="text"/>
Treatment Teams	All	<input type="text"/>
Treatment Team Leaders	All	<input type="text"/>

Only Print Zero-Priced Services

Clear Load Save Batch Print Exit

Selections_5

No action required

Client Services Listing (Administrative Access)

Selections1 | Selections2 | Selections3 | Selections4 | **Selections5** | Print Columns | Sgrt/Subtotal/Title

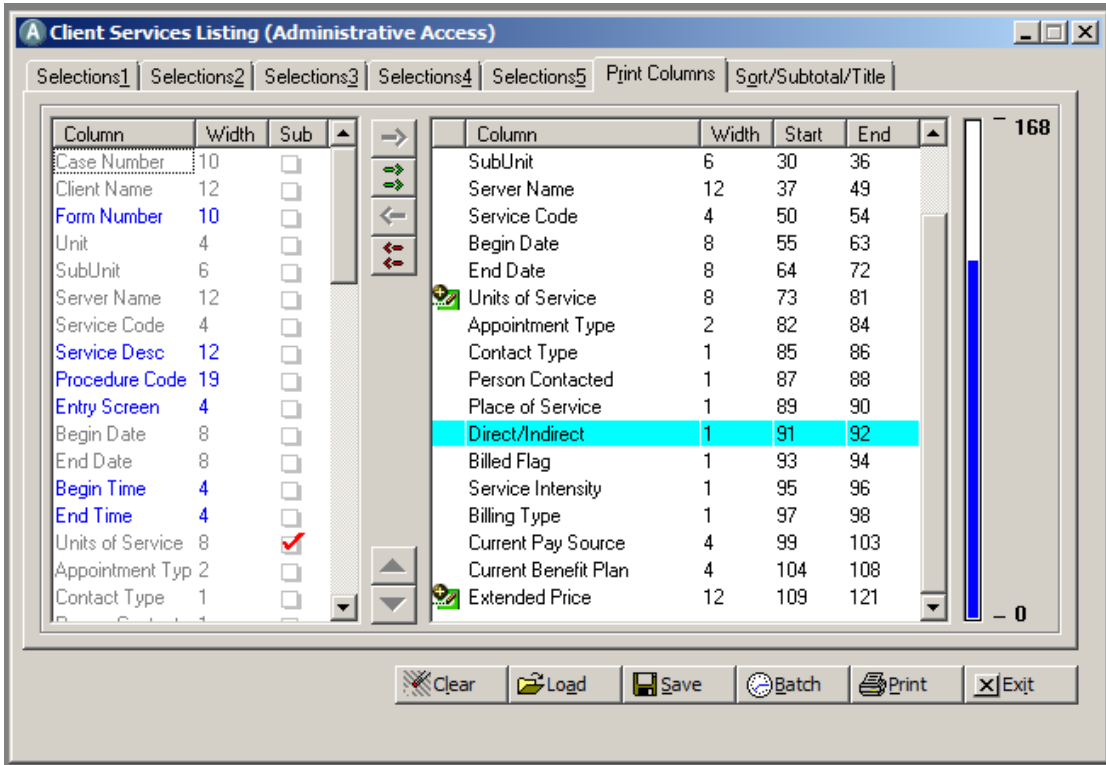
Assignments with Date Opened from: thru
Assignments with Date Closed from: thru

EBP/SS's	All	<input type="text"/>
CalOMS Referral Source	All	<input type="text"/>
COPS Orig Svc Pay Sources	All	<input type="text"/>
COPS Orig Svc Benefit Plans	All	<input type="text"/>
Unplanned	All	<input type="text"/>

Clear Load Save Batch Print Exit

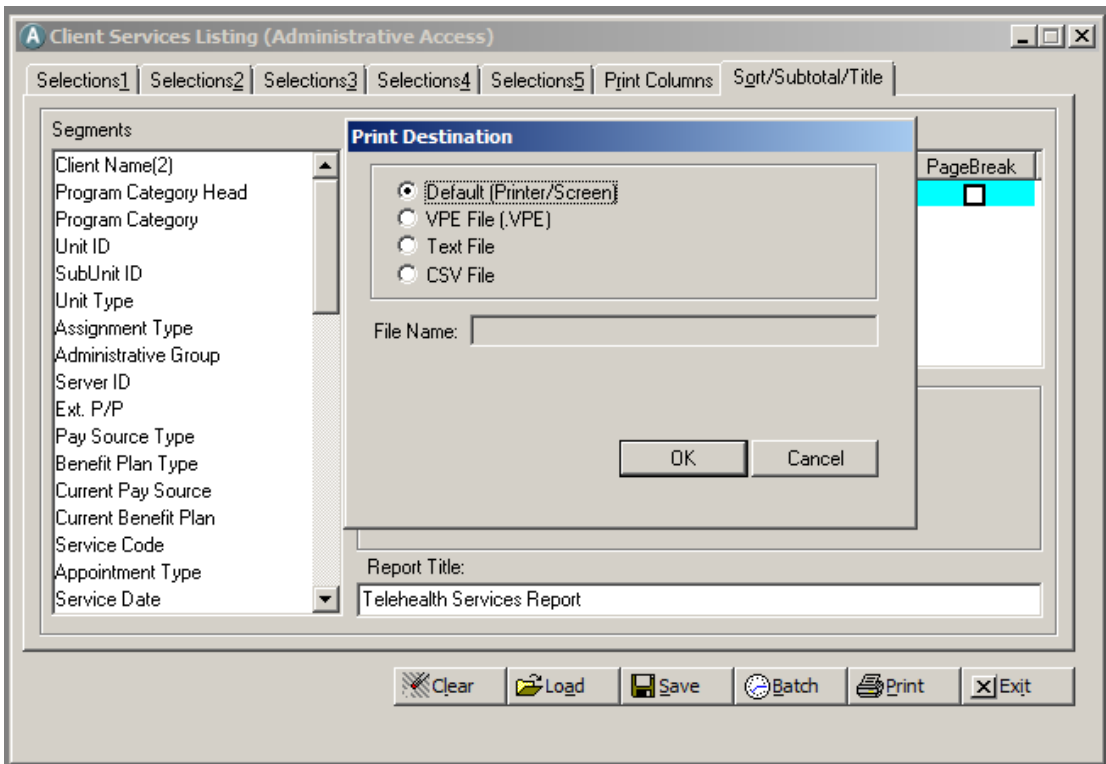
Print Columns

No action required



Sort/Subtotal/Title

Click print then click ok



7. TELEHEALTH SERVICES

**All programs are to complete Item A. If program responds "YES" to one or both item A inquiries, program shall complete items B through D.
(Please refer to CYF Memo No. 12-19/20)**

Item A: Program Telehealth Status

Program is utilizing Tele-
Mental health services
Program is utilizing Tele-
Psychiatry health services

Choose from dropdown menu

Implementation date

Item B: Program Written Outline

Date Program provided COR with a written plan/update that outlines the current protocol prior to implementation

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Item C: Year-to-Date Telehealth Services (Program to run report utilizing Telehealth Services Report instructions)

YTD Number of Unique Clients served with telehealth services

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YTD Number of Telehealth services provided by the program

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Item D: Annual Attestation

Date program submitted written Annual Attestation to COR (per QI memo dated 05/31/19)

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Annual Attestation
Statements:

- 1.) Telepsychiatry provider has verified devices and software use the latest security patches and updates, the latest antivirus, anti-malware, and firewall software have been installed on devices, and the underlying network provides security.
- 2.) Telepsychiatry provider has verified devices use security features such as passphrases and two-factor authentication and encrypt any patient data stored locally.
- 3.) Telepsychiatry provider has verified audio and video transmission is encrypted at FIPS 140-2 certified 128 bit standard as required by Article 14 within County of San Diego contracts.
- 4.) Telepsychiatry provider has verified that any peer-to-per videoconferencing (streamed endpoint-to-endpoint) is not stored or intercepted by the vendor in any way; and that any recorded videoconferences or, if available, text-based chat sessions near the chat window are stored locally, on HIPAA-compliant devices or electronic record keeping system, in order to safeguard any electronic protected health information or PHI.

Comment:

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