

Guidelines to Using Telehealth for Addictions, Mental Health and Substance Use Disorder Providers

The following is a guideline on how to utilize telehealth services in your practice. This guide will help you with basic guidelines if you are considering implementation of telehealth services.

Before implementing telehealth services into your practice, there are a few points for users/agencies to understand and consider:



- Continue to check your state and federal authorities on the use of telehealth. Currently (as of 3/19/2020) the U.S. Department of Health and Human Services (DHHS) and Office for Civil Rights (OCR) has released a statement regarding telehealth that it “will exercise its enforcement discretion and will not impose penalties for noncompliance.” (See the link below for more details)
- Contact your payor sources to find out their terms for Telehealth. Although DHHS is national, states can interpret differently. Most states have released their own statements to providers.
- Based on the guidelines from DHHS, popular applications that allow for video chats are allowed without the risk that OCR will impose a penalty for noncompliance. A list of applications that are HIPAA compliant include: Skype for Business, Updox, Zoom for Healthcare, to name a few. This does NOT include public-facing apps, such as Facebook Live, Twitch and TikTok, since these programs are designed more for public and mass viewing. Keep in mind that some of these products offer a FREE version, which may limit features such as reporting, number of participants in a session, time of sessions, etc.
- Some of the products will enter into a HIPAA Business Associates Agreement with your agency. However, as stated, OCR will not impose penalties against covered health care providers for the lack of a BAA with these products. View the details of the full release here:
<https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html>
- SAMHSA released a statement concerning 42 CFR during this Public Health Emergency, stating providers should make “their own determinations” on whether or not to provide treatment to patients via telehealth services. The full statement can be viewed here:
<https://www.samhsa.gov/sites/default/files/covid-19-42-cfr-part-2-guidance-03192020.pdf>

In summary, a majority of regulations, governed by OCR and DHHS, have been tempered, due to the current national public health emergency. Thus, when choosing a telehealth application, be mindful of its features and costs that will be right for you.

Orion has selected Zoom to demonstrate the use of telehealth and how to implement that process with AccuCare. You will be able to access this user guide (Zoom with AccuCare) at www.myAccuCare.com. If you have any questions, please contact us at 800.324.7966 or email support@orionhealthcare.com.