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POLICY

Telehealth is the remote delivery of healthcare services by a qualified provider to a client using telecommunications technology. Where allowed by Liberty customer contracts, Telehealth is used by Liberty to efficiently and effectively provide healthcare to clients, when logistical challenges make in-person care impractical.

PROCEDURE

Telehealth services are subject to the same professional standards as in-person healthcare, applicable Federal and State laws, and Liberty’s Standard Operating Procedures.

Liberty developed Telehealth Guidelines to serve as a resource for its health care providers and managers to assist them in the implementation and use of telehealth services. These Guidelines are attached and included in Appendix A.

Approved By: _____

Revision History

Version	Date	Author	Summary of Changes
#1	11/07/2019	Ian Castronuovo	Policy Created
#2	06/30/2020	Ian Castronuovo	Policy reviewed with no changes needed
#3	06/24/2021	Ian Castronuovo	Policy reviewed with the following changes: replaced VP Ops with Contract Manager



Liberty Healthcare Corporation
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TeleHealth Guidelines

Appendix A



Table of Contents

Purpose of Telehealth Guidelines	2
Roles and Responsibilities	2
<i>Client / Provider Identification</i>	
Provider Training	3
Technical Considerations	3
<i>Technology Failure Back-Up Plan</i>	
Legal and Regulatory	4
<i>Obtaining Customer Approval to Provide TeleHealth Services</i>	
<i>Privacy and Security</i>	
<i>Provider Licensure and Certification</i>	
<i>Scope of Practice</i>	
<i>Ethical Considerations</i>	
<i>Informed Consent</i>	
<i>Staffing Requirements</i>	
Physical Location Requirements	6
<i>Room Specifications</i>	
<i>Placement of Furniture and Equipment</i>	
<i>Privacy and Security</i>	
Clinical Considerations	8
<i>Client Selection</i>	
<i>Client Safety and Emergency Procedures</i>	
Ethical Considerations (Special Populations)	9
<i>Child and Adolescent Populations</i>	
<i>Forensic / Correctional Populations</i>	
<i>Geriatric Populations</i>	
<i>Substance Use Disorder Populations</i>	
<i>Inpatient and Residential Populations</i>	
Cultural Issues	10
Recruitment	10
Quality Assurance	11
<i>Compliance</i>	
<i>Credentialing</i>	
Program Forms and Checklists	
Requirements for Remote Office	13
Informed Consent for TeleHealth	14

For the purpose of this document, “provider” refers to the clinician providing telehealth services. “Client” refers to the recipient of telehealth services.

Purpose of Telehealth Guidelines

Adherence to standards for telehealth is an important and valuable process to help ensure effective and safe delivery of quality healthcare. This document provides guidelines and standards for providing telehealth. It is important to note that basic standards of professional conduct governing each health care profession are not altered by the use of telehealth services. When delivering telehealth services, each provider must deliver services in accordance with their own profession’s best practices, scope of practice, and legal and ethical guidelines. All providers shall be aware of pertinent professional standards and national existing practice guidelines regarding the provision of telehealth services.

Roles and Responsibilities

Prior to the start of telehealth services, the provider shall inform and educate the client, in language they can easily understand, of all information pertinent to receiving telehealth services, including: Review of Informed Consent for Telehealth Services, structure and timing of sessions, privacy and security, confidentiality / limits of confidentiality, mandated reporting, action to be taken in the event of technical difficulties or disconnection, and any other information specific to the nature of telehealth services.

The provider shall also discuss with the client appropriate expectations regarding telehealth services, including prescribing policies, scope of services, communication, emergency plan, follow-up and conditions under which telehealth services may be terminated or a referral made for in-person services.

Client / Provider Identification

It is the provider’s responsibility to identify the recipient of telehealth services, and to provide the client, or his / her authorized representative, with his / her name and qualifications. The provider can verify the identity of the recipient of services through a photo identification or requesting verification from a Liberty staff member. Where there is an existing established relationship between client and provider and this documentation already exists, this process can be omitted.

Provider Training

Liberty offers several resources to support providers of telehealth services. Liberty's IT department is available to assist with any technological training needs or ongoing support. Liberty's Vice President of Performance is available to assist with any questions or concerns regarding professional standards, competence and HIPAA-related issues.

It is recommended that all providers complete the one-hour Relias course Best Practices in Delivering TeleHealth prior to providing services: This course provides an excellent overview of the use of telehealth in behavioral health services, including a description of the most effective approaches. The learner will gain knowledge about building and maintaining rapport with clients remotely via telehealth as well as the strengths and weaknesses of telehealth practice, including ways to address those weaknesses.

Technical Considerations

Liberty shall ensure all communication modes and applications have appropriate verification, confidentiality and security parameters necessary.

Liberty shall ensure both provider and client use high quality cameras and audio that is appropriate for telehealth services. All devices shall have up-to-date security software per the manufacturer's recommendations.

Technology Failure Back-Up Plan

It is the responsibility of the provider to communicate to the client, prior to the onset of each telehealth session, a telephone number in which the provider can be contacted in the event of an unanticipated disconnection. The client or program staff shall contact the provider in the event of an interrupted session to continue or reschedule the session.

Legal and Regulatory

Obtaining Customer Approval to Provide TeleHealth Services

It is the responsibility of the Director of Operations and / or Contract Manager to ensure that the contract for each program includes provisions for telehealth services. If telehealth services are not referenced in the contract, the Director of Operations and / or Contract Manager will obtain written approval from the client to provide telehealth services.

Privacy and Security

It is the responsibility of Liberty to ensure all audio, video and data transmission shall be secure through the use of encryption that meets recognized standards.

In order to prevent a client from accessing a session already in progress with another client, the provider shall schedule separate appointment for each individual telehealth session.

Telehealth sessions shall never be recorded.

Provider Licensure and Certification

Health care services are defined as delivered in the state in which the client is located. Providers of telehealth services shall comply with state licensure laws, which typically entail holding an active professional license issued by the state in which the client is physically located during a telehealth session. Liberty is responsible for determining the type of licensure required and ensuring all providers are in compliance with state licensing board regulations.

All providers shall provide services consistent with the jurisdictional ethical, regulatory, licensing, credentialing and insurance laws for their profession in both the site in which they are practicing as well as the site in which the client is receiving care. All providers shall ensure compliance as required by appropriate regulatory and accrediting agencies.

Scope of Practice

Providers of telehealth shall ensure that the standard of care delivered via telehealth is equivalent to in-person care. Providers shall be aware of their professional organization's position on telehealth and incorporate these standards and clinical practice guidelines whenever possible. Providers should stay current with evolving technologies, telehealth research findings, and policies.

Ethical Considerations

Providers are responsible for maintaining the same level of professionalism, ethics, and clinical practice standards as in-person care when delivering telehealth services. In addition, they are responsible for adhering to additional telehealth concerns such as informed consent processes, client autonomy, and privacy.

Informed Consent

Local, state, and national laws regarding verbal or written consent shall be followed. If written consent is required, electronic signatures, assuming these are allowed in the relevant jurisdiction, may be used. The provider shall document the provision of consent in the medical record

It is the responsibility of the provider to obtain a signed Informed Consent for TeleHealth Services during the initial telehealth session. It is advisable that blank copies of this form be maintained at the program site in which the client is located in order to facilitate this process. The provider shall discuss the consent with the client, in a language he / she can understand, and confirm that the client fully understands the content of the consent.

Staffing Requirements

When psychiatric services are provided via telehealth, it may be recommended that a clinical staff member (LCSW, RN, LPT or LPN / LVN) be present, prior to start of the session and as long as necessary. The role of the clinical staff is to support the client and provide the psychiatrist with necessary information, such as vital signs, responses to medication, side effects, etc. The nursing staff will also assist with follow-up recommendations such as lab orders, medication changes, etc. If nursing staff are not available, the Program Director / Manager shall assign appropriate staff to assist and support the client during the sessions.

Staff assisting the client should be mindful of the client's right to privacy and confidentiality during the telehealth services. All clients have the right to meet with their telehealth provider alone, so they are able to speak freely and openly. If there are safety concerns about a client being alone in a room (for example, a client who requires continual 1:1 supervision), this should be discussed within the interdisciplinary team meetings in order to determine a workable solution.

Physical Location Requirements

Room Specifications

The provider's location shall be a fully enclosed room that is secure, private and reasonably soundproof. The room must be equipped with a locked door to prevent unexpected entry. Efforts shall be made to ensure discussion cannot be overheard by others outside of the room in which services are provided.

The room of the client receiving telehealth services should be in a quiet location, minimizing exposure to noises and disruptions such as busy corridors or hallways, common areas, restrooms or other sources of noise. Ideally, the room should be an enclosed, private room. If this is not possible, precautions shall be taken to ensure the client has privacy and the contents of the session cannot be viewed or overheard by other persons.

The room should be large enough to comfortably accommodate the client and any other persons participating in the session. If the session is attended by several participants, ample seating will need to be provided for each participant.

Lighting is an important consideration as it directly impacts the provider's ability to view the client clearly and with accurate color representation. Optimal lighting includes a diffused light source that does not create shadows and depicts colors accurately. A good source of diffused light is a light source in front of the client. Backlighting from overhead lights or windows should be avoided as it can interfere with a clear view. Wall color also impacts how clients appear on video. Ideally, walls should be a solid color. A light blue or gray background tends to work well for all skin tones.

Acoustics in the room in which services are being delivered is another important consideration. Echoes can make communication difficult, as can external noises from other staff, heating / air conditioning units, etc. Using rooms with carpet / rugs and drapes can help soften the sound and improve the acoustics of the room.

Placement of Furniture and Equipment

Equipment should be placed to optimize the camera's view of the client and provider. A chair should be placed at the correct height and distance from the camera and microphone. At the onset of the appointment, the provider and client check with each other to ensure they can see and hear each other well.

Cameras should be placed so that both the provider and client are able to look directly at each other. If the camera is placed too close or too high, the person will appear to be looking down, rather directly at, the monitor.

Privacy and Security

The United States Health Insurance Portability & Accountability Act (HIPAA), and state requirements, shall be followed at all times during the provision of telehealth services. Clients receiving mental health and substance use services are afforded a higher degree of client's rights as well as organizational responsibilities (e.g., need for specific consent from clients to release substance use treatment information). Telehealth providers shall be aware of these additional responsibilities and ensure they are achieved. In order for all Liberty staff to keep current on HIPAA rules and regulations, Liberty provides both pre-hire and annual HIPAA training, monthly HIPAA e-mail alerts and also quarterly Liberty QualityCare® Newsletters that outline HIPPA privacy and security information and recent HIPAA violations that have been reported by the Officer of Inspector General.

Clinical Considerations

Client Selection

There are no absolute contraindications to clients being assessed or treated using telehealth. The appropriateness of telehealth services for a client is at the discretion of the provider, who is to use his / her clinical judgment. For clinically unsupervised settings where support staff are not immediately available, the provider shall consider the appropriateness for each individual client. Considerations in these unsupervised settings include the client's ability to take an active and cooperative role in the treatment process as well as their ability to set up and manage the videoconferencing system.

The provider should consider whether there are medical issues requiring an in-person examination prior to the onset of telehealth services. If the provider cannot manage the medical aspects for the client, this should be documented in the medical record and referrals should be made for physical exams as clinically indicated.

Client Safety and Emergency Procedures

The provider shall be familiar with emergency procedures in the setting in which the client is located. It is the responsibility of the Liberty Program Director / Manager to ensure there are proper emergency procedures in place in all programs in which telehealth services are provided and that the telehealth provider is provided with such information. Such procedures should include:

- Identification and contact information of clinical team members who should be contacted in case of a psychiatric emergency
- Identification of local emergency resources and phone numbers
- Becoming familiar with the location of nearest hospital emergency rooms capable of managing psychiatric emergencies
- Having client's family / support contact information (with client's consent).
- The average response time of emergency personnel.

Ethical Considerations

Special Populations

Child and Adolescent Populations

Telehealth services for children and adolescents shall follow the same guidelines for adults with modifications to consider the developmental status, such as motor functioning, speech and language capabilities, relatedness, and relevant regulatory issues. When working with younger children the environment should include adequate room size, furniture arrangement, toys, and activities that allow the child to engage in age-appropriate activities and skills. The room and camera should be positioned so the provider is able to observe the child as he / she moves about the room and engages in activities. If possible, a remote camera should be used that can be controlled by the provider.

Providers should adhere to usual in-person practices for including relevant adults and support members in telehealth sessions with children and adolescents. Extended participation may include a family or staff member who may facilitate sessions (e.g., taking vital signs, assistance with rating scales, managing active children, assisting with any urgent interventions). Providers should consider how the family or staff member's involvement can affect service delivery (e.g., social familiarity with the family, perceived confidentiality, sharing information with other team members).

Forensic / Correctional Populations

Providers shall be aware of systems issues in working in forensic and correctional settings and follow applicable standard consent around both treatment and evaluation in terms of client's legal status and rights. Providers shall have clear site-specific protocols about working with clients and staff in forensic and correctional settings.

Geriatric Populations

Providing services via telehealth to the geriatric population can be a beneficial tool for increasing accessibility, especially for those who have mobility or transportation limitations. This population can face challenges in dealing with videoconferencing technology. Auditory and visual sensory deficits can impair their ability to communicate over a videoconference connection. In order to address these challenges, it is recommended the provider uses large monitors, good audio capabilities, and high bandwidth and video resolution to provide a large and clear picture.

An additional challenge for this population is the prevalence of dementia. Cognitive deficits as well as psychiatric symptoms, such as delusions, may cause stress and lack of understanding for elderly clients using videoconferencing technology. The provider and support staff will need to reassure the client that the service provider is real, versus a television personality or visual hallucination.

Substance Use Disorder Populations

Providers shall be aware of and comply with federal, state and local regulations around prescription of controlled substances involved in substance use disorder treatment. Providers shall coordinate with onsite staff to provide an appropriate standard of care including care coordination and monitoring of ongoing treatment, as clinically indicated.

Inpatient and Residential Populations

Whenever possible, providers should work to integrate themselves into inpatient and residential care settings where they practice through virtual participation in administration and organizational meetings including clinical case staffing on a routine / regular basis. Remote providers should optimize use of program staff for help with case consultations and coordination as clinically indicated.

Cultural Issues

Providers shall be culturally competent to deliver services to the populations they serve. This includes, but is not limited to, awareness of the client's language, ethnicity, race, age, gender, sexual orientation, geographical location, and socioeconomic and cultural backgrounds. Providers should assess a client's previous exposure, experience, and comfort with videoconferencing and how this might impact telehealth services. Providers should conduct ongoing assessments of the client's level of comfort with technology over the course of treatment.

Recruitment

Liberty will follow its standard operating procedures for hiring and onboarding individuals into telehealth roles. Although priority consideration may be given to those candidates who have prior experience delivering services remotely via telehealth - individuals who lack telehealth prior experience will be considered, provided they meet the requirements as set for in their job description and also demonstrate a willingness and capacity to be trained on telehealth.

Liberty QualityCare®

The Liberty mission is “to be a trustworthy and outcomes-driven partner that empowers customers to achieve their goals with flexible and intelligent healthcare services. “Liberty QualityCare® is our signature service for Quality Performance / Quality Improvement. Liberty QualityCare® is, first, a robust quality framework that governs and standardizes the QP / QI requirements for every Liberty contract. It is also a rich valued-added package of QP / QI resources that can be brought to bear through technical consultative expertise for any given project or customer. Depending on the needs of the provider, Liberty QualityCare® consultations are available on request to assist a telehealth provider with QP / QI tools and methods for quality improvement and risk management, including Six Sigma, Root Cause Analysis, Failure Mode and Effects Analysis, population health consultations, and sequence analysis clinical workflows. The Liberty QualityCare® Newsletter will be e-mailed to each Tele Health provider quarterly with information about vital trends in the health care field, including best practices, regulatory updates, HIPAA, and QI / QP ideas and methods.

Compliance

Sentinel Event Reporting and Investigation:

All providers of all Liberty programs and contracts are required to quickly identify, report, and respond to sentinel events and other critical incidents. All telehealth providers are to immediately report to a Liberty manager any event that is assessed as critical. This Liberty Manager will evaluate if this is a sentinel event that must be reported to Corporate’s Vice President, Performance. A complete investigation will be concluded within 10 days and apply corrective actions or make improvements as needed. Incidents are also aggregated and analyzed by Liberty to identify negative trends and risk factors that may need to be addressed through systemic improvements and initiatives, both at the program level and on a company wide basis.

24 / 7 Corporate Compliance Program:

Liberty maintains a very strong Corporate Compliance Program that mandates annual affirmation of lawful and ethical behavior of all Liberty personnel. All personnel complete an initial and annual training module that explains the Compliance Program and details the rights and responsibilities of each provider to report unlawful, fraudulent, or unethical behavior. Each staff person must comply in all material respects with all Federal, State and Local laws and regulations that are applicable to our operations and is expected to detect, deter, and report any fraud, criminal conduct, or other forms of misconduct by other employees or subcontractors (agents). To encourage and facilitate the reporting of illegal and unethical behavior, we maintain a toll-free, Employee Help Line staffed with qualified and trained Compliance Risk Specialists, who are not employed by Liberty. These staff answer questions anonymously and track compliance issues and concerns on a 24 / 7 / 365 basis. Any potential sentinel event or reportable compliance event is investigated by Liberty’s Corporate Compliance Officer.

Credentialing

Liberty views credentialing as a key quality improvement process that enhances the effectiveness of our clinical programs and services. Our credentialing process goes beyond the verification of staff credentials to include an overall evaluation of professional competency. By applying a program-specific list of criteria for the given position at the facility / program, we identify and select only those candidates who possess the requisite qualifications and skill set to perform at a high level. This approach fosters teamwork, high job satisfaction, and retention, while promoting continuity of care and better outcomes. As a certified organization from the Joint Commission Health Care Staffing Services since 2006, all telehealth professionals will be required to have an audit by an advanced nurse competency evaluator to confirm provider credentials and qualifications prior to hire. Our credentialing team contacts universities, medical schools, licensing boards, and professional organizations to independently verify that the provider has earned each degree, license, board certification, or certification. They further confirm malpractice history, DEA and CDS certifications, review the National Practitioner Data Bank, and review the American Medical Association profile for Medicare / Medicaid sanctions. We also perform a comprehensive background checks intended to identify any behavior that may negatively impact or undermine a provider's performance going forward, including an Office of Inspector General report, and criminal background and credit checks. If a provider has been unemployed for any period longer than 30 days, we require a written explanation. We also perform credentialing updates annually for all providers to ensure that licenses and certifications are valid, and no sanctions have occurred.

TeleHealth Requirements for a Remote Office

For the purpose of these guidelines, a “remote location” refers to any office setting that is not a Liberty operated facility.

When providing telehealth services from a remote or home location, including a home office, the provider is responsible for ensuring the compliance with the following guidelines:

- Telehealth services are to be provided in a fully enclosed room that is secure and private.
- The room must be equipped with a locked door to prevent unexpected entry and to protect the equipment, data and confidentiality of telehealth services.
- All telehealth services should be as secure and confidential as if provided face-to-face, including if needed, using a white noise machine, sound insulation, etc. Efforts shall be made to ensure discussion cannot be overheard by others outside of the room in which services are provided.
- The computer screen should not be visible from a window, or other opening where an unauthorized person could view data.
- If others are in the client’s or provider’s room, both the provider and client shall be made aware of the other person and agree to their presence.
- The provider is to provide telehealth services in a manner free from disruptions and interruptions.
- Access to the computer used for telehealth is to be limited to the provider only.
- The provider shall be familiar with the use of any devices or software employed in delivering telehealth services. Liberty will provide any training necessary prior to the onset of telehealth services.
- All Wi-Fi connections must be password protected and allow for encryption.
- Provider will only provide telehealth services through the Liberty Zoom application.
- Provider is to have access to a telephone during all sessions and provide the client and program with the telephone number in the event of a disconnection.
- All paperwork and documentation are expected to be completed in a timely manner, consistent with the expectations of face-to-face services and per contractual requirements.

Liberty will:

- Provide technical support to ensure Wi-Fi connections are secure and that the provider’s computer has all capabilities required to provide telehealth services.
- Provide remote access to technical support to the provider, as needed.
- Monitor services to ensure the quality and quantity of work is consistent with the expectations of in-person services and per contractual requirements.

Informed Consent for TeleHealth Services

For the purpose of these guidelines, a "remote location" refers to any office setting that is not a Liberty operated facility.

I understand that Liberty provides some services, such as psychiatric assessments, counseling, and medication management, through video conferencing (telehealth) and that during such services my provider will be located at a different site.

I understand that the laws and regulations pertaining to confidentiality and protecting my privacy apply to telehealth services.

I understand there are expected benefits to telehealth, including improved access to medical care and more efficient assessment and treatment.

I understand there are potential risks to telehealth, including technical difficulties that may cause interruptions or unauthorized access. In very rare instances, security protocols could fail, causing a breach of privacy of personal information.

I understand that Liberty staff may be present during telehealth services in order to assist with the video equipment. Such persons will maintain confidentiality of any information obtained. I will be informed of their presence during services and have the right to ask them to leave or end the session at any time.

I understand that my telehealth provider may request physical examinations or tests (e.g., vital signs, height / weight, etc.) be conducted by providers at my location.

I have had a direct conversation with my telehealth provider, during which I had the opportunity to ask questions in regard to these services. My questions have been answered and the risks, benefits and any practical alternatives have been discussed with me in a language in which I understand.

I understand that I have the right to withhold or withdraw my consent to the use of telehealth at any time, without affecting my right to future care or treatment. I may revoke my consent orally or in writing at any time by contacting Liberty Healthcare Corporation.

By signing this form, I certify:

That I have read or had this form read and / or explained to me.

That I fully understand its contents including the risks and benefits of telehealth services.

That I have been given ample opportunity to ask questions and that any questions have been answered to my satisfaction.

Client Full Name

Signature of Client or Authorized Representative

Date