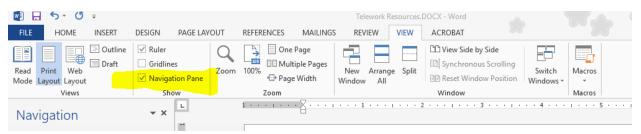# HCBW Services Distance Delivery Best Practices

The following resources are available to help transition to distance delivery of certain Home and Community Based Services during the COVID-19 Health Emergency. The intention is to keep our most vulnerable Alaskans healthy, safe, and included within our community while adhering to the Emergency Mandates.

Access relevant sections in this document by using the navigation panel. This feature is located on the View Tab. You must check the Navigation Panel Checkbox for it to display.

What is HIPAA compliant distance delivery?

The Health Information Portability and Privacy Act (HIPAA) protects the privacy of patient information. Both the Provider and a video conferencing vendor are responsible for upholding the HIPAA standards. Those standards cover use of data, encryption, servers, authentication, and audit trails.

This shared responsibility is legally recognized through a business associate agreement (BAA). The agreement acknowledges the risk and accountability if there is a HIPAA breach.

The list below includes some vendors that provide HIPAA-compliant video communication products and that they will enter into a HIPAA BAA.

Senior and Disabilities Services and the SDS training team does not endorse any one of these platforms. You will have to find the one that best meets your needs.

- Skype for Business / Microsoft Teams
- Updox
- VSee
- Zoom for Healthcare
- Doxy.me
- Google G Suite Hangouts Meet
- Cisco Webex Meetings / Webex Teams
- Amazon Chime
- GoToMeeting
- Spruce Health Care Messenger

The provider's role in HIPAA compliant distance delivery

A signed BBA and compliant encrypted software doesn't protect against violations. Providers must always take action to protect the clients' information. This includes:

- Send meeting invites to the correct email address (es).
- Verify correct attachments before sending.
- Do not make meetings or classrooms public.
- Do not share a link to a teleconference or classroom on an unrestricted publicly available social media post. Provide the link directly to specific people.
- Manage screen sharing options to "Host Only."
- Use the updated version of remote access/meeting applications.
- Set password and do not reuse passwords for meetings. Scheduling meetings with the same passwords weakens meeting protection considerably.
- Schedule a Meeting instead of using your Personal Room or personal meeting ID. Personal Rooms and personal meeting ID web links do not change. Improve security by scheduling a meeting which includes a one-time web link.
- Share an Application instead of sharing your Screen to prevent accidental exposure of sensitive information on your screen. Ex. Microsoft Office products, Web browsers, etc.
- Delete recordings after they are no longer relevant.
- Disable "File Transfer" unless you know this feature will be required
- Create a Host Audio PIN. Your PIN is the last level of protection for prevention of unauthorized access to your personal conferencing account. Should a person gain unauthorized access to the host access code for a Personal Conference Meeting (PCN Meeting), the conference cannot be started without the Audio PIN. Protect your Audio PIN and do not share it.
- Do not click on emails where you don't know the sender, email has inconsistencies with grammar and/or spelling, or contain a web link you're unfamiliar with.
- Do not use Facebook, Google or other profiles to sign in: It might save time, but it is a poor security practice and dramatically increases access to personal data.
- Use two devices during calls: If you are attending a meeting or call on your computer, use your phone to check your email or chat with other call attendees.
- Consider turning on the "waiting room" for your meeting so that you can scan who wants to join before letting everyone in.
- Expel Attendees at any time during a meeting. Select the name of the attendee whom you want to remove, then select Participant > Expel.
- Disable "Allow Removed Participants to Rejoin" so that participants who you have removed from your session cannot re-enter.

What should I consider in choosing a distance delivery platform?

- **What do your clients need?** Are they already using other software? Will new software be too drastic a change? Maybe video conferencing won't work. Remember, it's not about changing services, it's about continued services.
- **Short term vs**. **Long term solutions**: Do you need telehealth capabilities to offer services during this state and national health emergency or is your business planning to virtually meet with other providers in the future.
- **Where are your clients located?** Internet strength varies throughout the state. You may need to consider more expensive platform with more advanced technology capabilities that can provide video regardless of internet strength.
- **What will work best for your business?** Some video conferencing platforms specialize in specific health fields and offer additional services beyond video conferencing such as appointment scheduling, reminders, etc.
- **Is there a BAA?** Not all venders are willing to sign a BAA. Ask the vender about their policy before agreeing to work with them.
- **Think about access and authentication controls.** Balance ease of use with unauthorized access. Some software have an extensive identification process. That may not work for some clients.
- **Look for "end-to-end encryption".** Technology is constantly changing, but end to end encryption is key for compliance.

Reference source: https://www.jotform.com/blog/best-hipaa-compliant-video-conferencing-software/

HIPAA and distance delivery during COVID-19 Emergency Declaration

The US Department of Health and Social Services issued an emergency notice regarding Telehealth Remote Communication during the COVID-19 National Public Health Emergency. You may read the full notice at: https://www.hhs.gov/hipaa/for-professionals/special-topics/emergency-preparedness/notification-enforcement-discretion-telehealth/index.html

In short:

- Providers may use non-public facing remote communication products to contact clients
- The Office of Civil Rights is using discretion on HIPPA compliance as long as it's in the good faith during the COVID-19 national health emergency.
- This applies to telehealth provided for any reason, not just the diagnosis and treatment of health conditions related to COVID-19.
- Health care providers may use popular applications that allow for video chats, including Apple FaceTime, Facebook Messenger video chat, Google Hangouts video, Zoom, or Skype, to provide telehealth without risk that OCR might seek to impose a penalty for noncompliance with the HIPAA Rules during the emergency.
  - Guidelines for use
    - Take action to avoid showing/sharing information unnecessarily.
    - Be aware of who is in the surrounding area

- - Do not text or request HIPAA information
    - notify clients that these third-party applications pose privacy risks, and providers should enable all available encryption and privacy modes when using such applications.
- Providers CANNOT USE public facing aps like Facebook Live, Instagram Live, Snapchat Twitch, TikTok, and similar video communication applications.

https://www.hhs.gov/sites/default/files/february-2020-hipaa-and-novel-coronavirus.pdf

Documenting Distance Delivery Services during COVID-19 Emergency

We are striving for consistent delivery of services during this national emergency. Services must be delivered and documented according to plan!

- Amendment K should be used to document a change in the environment (distance delivery).
- A standard amendment is needed if the service is changing.
    - Scope of Service, duration, frequency, adding non-Covid 19 related service(s)
    - Changing a Provider
    - Service type (Example - Supported employment to Supported Living)
- If service increments have not changed then documentation should provide enough detail for each unit provide.
- You can only bill for the services rendered. If the services is interrupted or disconnected you can only bill for the time service was provided.
- Services notes should note if distance delivery was used during the COVID-19 State Health Emergency.

Ideas for Distance Delivery:

- Communication and choice development vs. Exposure to new atmospheres, ideas, cultures.
- Explore the change in communication and methods of interaction. (Sign language, touch screen inter-faces, typing, drawing, etc.)
- Physical or hand over hand interventions to teach can be changed or enlist support from available supports.

Gearing up for Distance Delivery:

Some of us are in uncharted territory with distance delivery technology. Here are some tips for equipping your clients and staff.

- Ask what works: Be aware that not all clients have the resources or skills to meet virtually. You may only be able to connect with some clients by phone and other via video chat. As with all HCB services, you will have to adjust your approach based on the client's needs.
  Questions you may need to ask:
    - Are you comfortable meeting or exchanging information electronically?
    - Do you own or can you access a computer, tablet, or smart phone to check your email?
    - Do you have the internet or phone data to meet for a video chat?
- Explore community resources to address equipment or increased data packages.
    - Maybe there are old smart phones or tablets available in the community?

- o Assist the client to contact their internet or phone company to explore options during the COVID-19 emergency.
- Equipment Accessories that may help
  - o USB Headset and mic for laptop or tablet communication.
  - o Earbuds/headset and mic for cell phone.
  - o A tripod, phone/tablet, stand. These can be made from household items and help the client communicate comfortably or do other activities while communicating.
    Some ideas to search online:
    - Plastic Cassette Tape Cover
    - Binder Clip
    - Build a Lego Stand
    - Build a tripod with rubber bands and pencils
- Encourage a dedicated learning environment: the space will be where services are delivered.
  - o Talk with the client and/or their natural supports on what is needed to set it up.
  - o If you can't have a dedicated space, put away items at the end of the session.
- Set Ground Rules with the people in the teaching environment: Trouble shoot!
  - o Honestly discuss with the client, their family members, roommates, or staff how to support virtual service.
  - o Identify and minimize distractions.
  - o <u>Be careful to avoid scheduling your meeting with the client during special activities.</u>

COVID Coping Skills

The COVID-19 Pandemic is a scary and life changing event. The requirements of social distance and "hunker down" is a very different life style that may be traumatic for some. It's natural to have a lot of uncomfortable emotions that are difficult to identify. How are you coping? How are your clients coping? How are their families coping? Here are some ideas on coping.

1. Maintain Regular Hours: Set a schedule and stick to it. With everything going on, be consistent about your daily activities.

2. Eat healthy and explore new food. Make meal plans to help limit trips to the grocery store and explore new recipes.

3. Get up and moving: Make sure you are stretching and being active. Have a dance party. Go for a walk. Look up yoga videos.

4. Connecting with others: Virtual services are a tool in helping reducing feelings of loneliness during this time. Encourage clients to use the technological skills developed through your interactions to connect with family and friends.

5. Learn new things: many families are exploring the world of homeschooling. In response, many educators, celebrities, and companies are offering free lectures, lessons, and virtual meetings.

6. What are your ideas for coping during this time?

   Make it personal – figure out what works best for you. You may need to be inspired by some others that are working remotely as well by searching the internet, twitter or blogs.