



July 23, 2020

To: Health and Human Services Commission (HHSC) Family Violence Program Contractors

From: HHSC Family Violence Program (FVP)

Subject: July 2020 Updated Telephone Services Policy Guidance

Purpose

The purpose of this letter is to provide guidance regarding the accepted use of the telephone for HHSC approved services. This amended policy is effective July 1, 2020.

The HHSC Family Violence Program is extending the use of the telephone as a service channel for certain HHSC services. The telephone is only approved for these services when used to directly serve an established client who has had an intake completed within the past 12 months or has continued to receive services over the past 12 months. A telephone service does not include calls made on behalf of the client, appointment reminder calls, or hotline calls where the caller is not a client receiving services. Several specific examples of allowable and unallowable telephone services are listed in Appendix A.

HHSC will allow the use of a telephone to provide services under the following circumstances:

- **Legal Assistance:** This service can be reported to HHSC as a telephone service when providing a client with the following by phone: legal assistance including; identifying individual legal needs, legal rights and options, and providing support and accompaniment (including court accompaniments) in their pursuit of those options.
- **Information and Referral-Community Services:** This service can be reported to HHSC as a telephone service when providing a client with the following by phone: information and referrals about existing community resources, including but not limited to the following: medical care, legal assistance providers, protective and regulatory services, resource assistance, public assistance, counseling and treatment services, children's services, and any other appropriate family violence services.

- **Information and Referral-Employment:** This service should be reported to HHSC as a telephone service when providing a client with the following by phone: information and referrals about employment training and employment opportunities, either directly or through formal arrangements with other agencies.
- **Family Violence Option:** This service should be reported to HHSC as a telephone service when providing a client with the following by phone: a Family Violence Option (Good Cause) form or a Family Violence Exemption. Please refer to the Family Violence Option policy guidance for more information on how to report clients who only receive this service.
- **Intervention Services:** This service should be reported to HHSC as a telephone service when providing a client (including children) with the following by phone: intervention services such as; safety planning, understanding and support, advocacy, case management, and dating violence services.
- **Counseling:** This service should be reported to HHSC as a telephone service when providing a client with the following by phone: the use of therapeutic methods of treatment and/or one-on-one support delivered by a trained staff or volunteer. Counseling over the phone with children can now be counted.
- **Orientation:** This service should be reported one-time per client when providing introductions to the organization by a trained staff. Accepted funding sources for this service include: HHSC Shelter, HHSC Shelter A, HHSC Non-Residential, HHSC Satellite, and HHSC SNRP. In rare instances, an orientation service may be provided over the phone, if the survivor identifies at least one of the barriers outlined below:
 - survivor self-identified disability;
 - survivor discloses health or safety concerns in receiving services in-person;
 - significant geographic distance to the closest access point to services;
 - other significant transportation challenges as identified by the survivor;
 - survivor does not have access to technology that would allow for a face-to-face technology service;
 - for other challenges identified by the survivor, please contact your HHSC contract manager.

Providing an orientation/intake service over the phone should be considered a last resort option. When a survivor is unable or unwilling to travel to the center to conduct an intake, other options should be considered such as:

- meeting at a safe location identified by the survivor;
- utilizing Skype, Facetime or other face-to-face technology tools;

- providing the survivor with transportation to the center; or
- other innovative mobile advocacy efforts as approved by your HHSC Contract Manager.

When employing any of these methods for intake, including telephone, the center must have policies for providing all the required intake information and documentation as required by Texas Administrative Code, Chapter 379, including a process for obtaining required signatures on intake documents.

- **Emergency Orientation:** This service should be reported when providing a nonresidential client an Emergency Orientation during a one-time critical assistance service, such as at the hospital or court. Staff person must complete and retain an HHSC Emergency Nonresidential Proof of Orientation Form. Refer to the Emergency Orientation Policy Guidance for more information.
- **Educational Arrangement for Children:** This service should be reported to HHSC as a telephone service when providing a client with the following by phone: services that result in a resident or nonresident child being in compliance with the compulsory attendance requirements found in the Education Code. Examples include providing clothing or supplies for school, conferring with schoolteachers or administrators.
- **Child Services:** This service should be reported when providing services to a child resident that includes activities such as; structured arts and crafts activities and/or non-counseling, information activities provided by a trained staff person or a volunteer. This service also may include child care for nonresidential clients when the child's parent is receiving a family violence service or when child care services are provided for current family violence clients by the center's licensed or permitted DFPS child care facility. If the center contracts with a non-HHSC approved subcontractor, then the service can only be counted as a one-time referral. If transportation to the service is provided, each round trip can count as a Transportation service. If a parent resident is accompanying a child for any of the identified child services, record the service as a crisis intervention service for the parent.
- **Child Recreation or Social Group:** This service should be reported when providing a child client with group social activities such as; daycare programming, after-school programming, arts and crafts, special outings or other non-counseling information group activities.
- **Medical Care:** This service should be reported when providing a client with assistance in responding to any urgent medical situations for the adult/child residents, nonresidents or program participants accessing shelter center services. This also can include basic first aid, arranging for non-emergency professional medical services for adult/child residents, nonresidents, or

program participants, or obtaining prescription or nonprescription medication for the victim's self-administration.

- **Medical Accompaniment:** This service should be reported when accompanying a domestic violence victim to, or meeting a victim at a hospital, clinic, or medical office.
- **Support Groups:** This service should be reported when providing a client with support groups related to family violence led by trained staff, survivors, or volunteers covering educational material or issues brought up by the group. The shelter center's adult support groups may include recreational and/or social activities.
- **Transportation:** This service should be reported when providing a client with transportation and/or transportation assistance such as; arranging transportation to and from emergency medical facilities for shelter residents and nonresidents and/or from a safe place to the shelter for persons being considered for acceptance as residents of the shelter and who are located within the shelter's service area. This also includes non-emergency transportation for the adult/child resident, nonresident or program participant to a single destination or to a series of destinations in a single trip. Transportation can include staff providing or arranging clients' transportation to court, place of employment and other appointments. Transportation service also includes the provisioning of bus passes or taxi fares. Rideshare companies like Uber and Lyft may also be utilized for a transportation service. However, please make sure your agency is aware of the safety and background check policies the company has since some do not have as strict requirements as taxi companies.

Appendix A has several examples of allowable and unallowable telephone services.

Please contact me or your contract manager if you have any questions or need further clarification.

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APPENDIX A

The following list illustrates examples of allowable and unallowable telephone services. If you have questions about specific examples, please contact your HHSC family violence program contract manager.

Legal Assistance

Allowable Example: A case manager/advocate or legal advocate calls an established client to provide Crime Victims Compensation information or assistance with the application.

Unallowable Examples: A legal advocate calls a client to remind them of an upcoming court date.

An established client with a child support case calls the family violence center and an attorney provides legal advice. **This is unallowable because providing legal advice/representation is not an approved service under HHSC Family Violence Program shelter, nonresidential, or special nonresidential project contracts. However, it is allowable if your organization has a Legal Services EIF contract with HHSC.**

Information and Referral-Community Services

Allowable Example: A former shelter client calls her case manager/advocate to request information about low-cost child care facilities in the community.

Unallowable Example: Someone calls the hotline to request information about a community resource. It is unknown if this person was previously a client receiving family violence services from the center. **This is unallowable as a service but could be counted as a type of Hotline Call.**

Information and Referral-Employment

Allowable Example: A case manager/advocate calls a client to give them the address and phone number for the local workforce development office.

Unallowable Example: A case manager/advocate calls a workforce development office on behalf of a client and the client is not present during the call.

Intervention Services

Allowable Examples: A non-residential client calls her case manager to discuss safety planning.

A former residential client, who received services within the current fiscal year, but is no longer residing at the shelter calls her prior case manager to discuss safety planning with her and her teenage daughter.

Unallowable Examples: A hotline caller who has never received services calls to request resources and help safety planning.

A case manager calls a client to let the client know that resources are ready for pick-up.

Counseling Services

Allowable Example: An adult client who received in-person counseling services gets a job and can no longer come in for services. The client makes arrangements to receive counseling services over-the-phone.

Unallowable Examples: A counselor provides counseling services over the phone to a client who has not conducted an intake for the current fiscal year and is not a continuing client from the previous fiscal year.

A counselor calls the survivor to remind them of an upcoming appointment.

Orientation Services

Allowable Example: An adult with a disability wants counseling services but is physically unable to come into the center for services. The case manager conducts an intake over the phone for this potential client.

Unallowable Example: A hotline caller wants to receive intervention services over the phone but is unwilling to come into the center for an orientation, despite having access to transportation. This can be reported as an "Emergency Orientation" service over the telephone.

Emergency Orientation

Allowable Example: During a community education session, an attendee requests follow-up services. An advocate later calls the person to give them an emergency orientation and provide an intervention service.

Unallowable Example: A client who wants to receive ongoing remote counseling services is provided an Emergency Orientation service over the phone. The person should be provided a regular "Orientation" service over the telephone.

Educational Arrangement for Children

Allowable Example: Case manager has a phone call with a parent about McKinney Vento requirements and considerations.

Unallowable Example: Case manager calls a parent to let them know their child's school clothes and supplies are available to be picked-up.

Child Services

Allowable Example: Due to the need for social distancing, a child residing in a hotel does a structured activity with an advocate over the phone while the parent attends a virtual job training.

Unallowable Example: Case manager calls a client to see if their child will be in child care the following day.

Child Recreation or Social Group

Allowable Example: Family violence center coordinates a virtual cooking class for current youth clients and several participants call-in to the activity instead of joining through face-to-face technology.

Unallowable Example: Case manager calls a youth participant to see if they are joining for an upcoming trip or event.

Medical Care

Allowable Example: An advocate has a phone conversation with a survivor to discuss her concerns and think through questions for her to ask her doctor at their next appointment.

Unallowable Example: An advocate talks to a client on the phone and reminds her of an upcoming medical appointment.

Medical Accompaniment

Allowable Example: A returning client calls her advocate during a medical appointment and he/she provides support and/or advocacy over the phone.

Unallowable Example: An advocate calls a new client to schedule an orientation/intake while the person is in the hospital.

Support Groups

Allowable Example: A group of clients who have previously received services now meet virtually and some of the clients call-in to the group instead of joining through face-to-face technology.

Unallowable Example: A family violence center does not have space to host a support group in-person, and so it only offers Support Groups remotely.

Transportation

Allowable Example: Case manager calls a client to arrange transportation for an upcoming court hearing.

Unallowable Example: Case manager calls the local taxi company to check on the status of a pick-up request.