



August 1, 2023

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

From: HHSC Family Violence Program (FVP)

Subject: Written Services Policy Guidance

Purpose

The purpose of this letter is to provide guidance regarding the new accepted use of a *written* service channel for HHSC approved services.

Effective September 1, 2023 HHSC FVP will allow the use and reporting of “written” as a service channel for the HHSC services outlined within this guidance and Appendix A. Written services include text messaging, chat, email correspondence, or letters with a client. The written service channel 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. As with any service, only *meaningful* written services (those that the survivor determines as important to their safety and needs) should be reported to HHSC. A service should not be reported for each correspondence, for example each text or email, but for the service as a whole. A written service does not include emails or letters written on behalf of the client, appointment reminder texts or emails, or hotline chats where the person is not a client receiving services. Specific examples of allowable and unallowable written services are listed in Appendix A.

In addition, written services may only be provided with client consent and indication that written is their preferred manner in receiving services. The client’s safety should also be assessed when providing a written service. Organizations providing written services must ensure their existing policies address related privacy and confidentiality laws so that best practices are followed regarding limited information being shared, periodic deletion of communications, and continuing to ensure that the survivor’s preferred communication channel is utilized.

HHSC will allow the use of a written service channel to provide services under the following circumstances:

- **Child Services:** This service should be reported when providing services to a child including activities such as; structured arts and crafts activities and/or non-counseling, information activities provided by a trained staff person or a volunteer.
- **Educational Arrangement for Children:** This service should be reported to HHSC as a written service when providing a client with the following in writing: services that result in a resident or nonresident child being in compliance with the compulsory attendance requirements found in the Education Code. Examples include emailing with the parent about school requirements or discussing the child's educational needs.
- **Family Violence Option:** This service should be reported to HHSC as a written service when providing a client with the following in writing: a Family Violence Option (Good Cause) form or a Family Violence Exemption.
- **Information and Referral-Community Services:** This service can be reported to HHSC as a written service when providing a client with the following in writing: 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 written service when providing a client with the following in writing: information and referrals about employment training and employment opportunities, either directly or through formal arrangements with other agencies.
- **Intervention Services:** This service should be reported to HHSC as a written service when providing a client (including children) with the following in writing: intervention services such as; safety planning, understanding and support, advocacy, case management, and dating violence services.
- **Legal Assistance:** This service can be reported to HHSC as a written service when providing a client with the following in writing: legal assistance including identifying individual legal needs, legal rights and options, and providing support in their pursuit of those options.
- **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. In terms of written services, this would likely be follow-up text or email communications between a survivor and their advocate.

- **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.
- **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.

Shelter Enter, Shelter Exit, and Overnight Stay for Youth services are not allowed as written services and FVNet will not accept them.

Appendix A has examples of allowable and unallowable written services.

Please contact your contract manager or the program's shared mailbox at familyviolence2@hhsc.state.tx.us if you have any questions or need further clarification.

APPENDIX A

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

Child Services

Allowable Example: An advocate emails a parent and child instructions and information about a structured activity to do on their own.

Unallowable Example: A case manager writes a client to see if their child will be in childcare the following day.

Educational Arrangement for Children

Allowable Example: Case manager has an email exchange with a parent about McKinney Vento requirements and considerations.

Unallowable Example: Case manager texts a parent to let them know their child's school clothes and supplies are available to be picked-up. When the client comes to pick-up the supplies, this could be entered as a face-to-face service.

Family Violence Option

Allowable Example: A nonresidential client asks their case manager for help with a good cause recommendation to close down their child support case. At the client's request, the case manager completes the required form and emails it back to the client to upload into YourTexasBenefits.com.

Information and Referral-Community Services

Allowable Example: A former shelter client texts her case manager to request information about low-cost childcare facilities in the community.

Unallowable Example: Someone sends a chat to 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 both as a service and as a type of Hotline Call since hotline chat is currently not reportable to HHSC.**

Information and Referral-Employment

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

Unallowable Example: A case manager/advocate emails a workforce development office to get information on behalf of a client. **This is unallowable because only services provided directly to clients should be reported, not work done *on behalf of* a client without their involvement.**

Intervention Services

Allowable Examples: A non-residential client texts 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 emails her prior case manager to discuss safety planning with her and her teenage daughter.

Unallowable Examples:

A case manager emails a client to let the client know that resources are ready for pick-up. However, when the client comes in to pick-up the resources, this can be counted as a face-to-face intervention service.

Legal Assistance

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

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

Medical Accompaniment

Allowable Example: A returning client texts her advocate during a medical appointment, and he/she provides support and/or advocacy through text.

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

Medical Care

Allowable Example: An advocate has an email exchange 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 sends a note to a client to remind her of an upcoming medical appointment.

Transportation

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

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