Considerations for Outpatient Mental and Substance Use Disorder Treatment Settings

Persons with Serious Mental Illness that are served in outpatient treatment settings may be at elevated risk for acquiring Covid-19 and may have a more complicated course. This is because of increased comorbidity of chronic medical conditions as well as limitations in accessing preventive and ongoing primary care. The Centers for Disease Control and Prevention (CDC) gives some specific guidance for outpatient facilities during the Covid19 emergency1:

- Reschedule non-urgent outpatient visits as necessary.
- Consider reaching out to patients who may be a higher risk of COVID-19-related complications (e.g., elderly, those with medical co-morbidities, pregnant women and potentially other persons who are at higher risk for complications from respiratory diseases) to ensure adherence to current medications and therapeutic regimens, confirm they have sufficient medication refills, and provide instructions to notify their provider by phone if they become ill.
- Eliminate patient penalties for cancellations and missed appointments related to respiratory illness.

Additional considerations include:

- Use telemedicine including telephone where possible.
- Continue regular check in with high risk patients.
- The HHS Office of Civil Rights has suspended enforcement of HIPAA through waiving penalties for violations during the Covid -19 Public Health Emergency.

Specific guidance for telemedicine services is also available, should providers wish to shift to telemedicine.2 Medicare telepsychiatry restrictions have recently been loosened in response to Covid-193. In addition, some states have issued new guidance for telepsychiatry and billing to state Medicaid (e.g. New York state4). Specific health plans vary widely in reimbursement for telepsychiatric services.

Outpatient settings that provide treatment for homeless individuals may find guidance specific to shelters and facilities serving the homeless useful.5 Homeless individuals may be at high risk for exposure to Covid-19 and might have particular challenges with social distancing and quarantine.

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3 Medicare and Coronavirus https://www.medicare.gov/medicare-coronavirus