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DOUGLAS A. DUCEY
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TOBI ZAVALA
Executive Director

MEMORANDUM

TO: Board Licensees
FROM: Tobi Zavala, Executive Director
DATE: January 14, 2021
RE: A.A.C. R4-6-1106. Telepractice

Part of the mission of the AZBBHE is protection of the public. An aspect of this duty is protection of clients when working with them via telepractice. Telepractice presents unique challenges especially since the client being served may not be in the same city as the licensed professional. There have been some questions relative to the rules on telepractice. To assist with these questions please see the following:

R4-6-1106. Telepractice C. 1. d. Manner of identifying the client when using electronic communication that does not involve video;

Most of these requirements can be fulfilled with information gathered at an initial visit/intake and use of uniform progress note forms with specific fields to check that all is the same, or if different, to note the new/additional information. The following tips may be useful in developing how to comply without undue burden and time spent.

If working with a client using technology that does not involve video, such as telephone, text, chat/messaging or email, some of the means of identifying the client can be through use of a password, security question or assigning the client a code unique to that person. **These could be set up at the time of the initial session or assessment.** It would be important to help the client to understand that they not share this with other people. This helps to ensure client confidentiality and also that you are communicating with the appropriate person.

R4-6-1106. Telepractice C.2. Mode of session, and verification of the client's physical location during the session and local emergency contacts;

Documentation of the mode can be adding check boxes on existing forms indicating in person, video, telephonic, electronic (text/chat/email). Or an **addition to the note stating, "Client session provided via (insert appropriate mode)"**.

Documenting physical location is important for client safety in the event of an emergency related to the client and/or for responding local resources to ensure the client's immediate welfare. This is especially vital when working with clients not in the same city as you, as your local 911 may not be able to connect you with emergency services where your client is located.

An adjustment to your existing progress note could be **the addition of a check box indicating "at home address" and a second check box indicating "other location" with space to add the address of the other location.**

For the protection and safety of the client, it would be important to have pre-acquired and documented in the progress note the local emergency services. In the event of an emergency or need for response the licensed professional would need to be able to immediately connect with emergency services. Trying to talk the client through the crisis while looking up local emergency providers would be difficult.

Adding a line to the existing progress note near the patient location with the local Emergency Services number will provide for greater ability on the licensed provider's part to respond to an emergency with the client.

Some licensed professionals will get an emergency contact person from the client and a release allowing them to speak with the client's emergency contact.

These are suggestions on how to meet the requirements under the rules. It helps to ensure the safety of the client. It is recommended that if you are providing telepractice, search for outside trainings to increase your knowledge and skills regarding the provision of care.