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## Memorandum

Date: October 28, 2020

To: Clinically Responsible Service Providers (CRSP)

From: Melissa Moody, Chief Clinical Officer- DWIHN

Re: Telehealth- IPOS signatures

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At the most recent Clinically Responsible Service Provider (CRSP) meeting held on October 22, 2020, a question was raised regarding the collection of written signatures on the Individual Plan of Service (IPOS). It was noted that due to the pandemic many providers are utilizing telehealth services which is a barrier to obtaining written consent for the IPOS. At that time DWIHN indicated we would look further into the telehealth IPOS requirements and provide a clarifying communication to the provider network.

It has been determined that CRSPs may obtain verbal consent for an IPOS while using telehealth during this pandemic. This is consistent with the Michigan Department of Health and Human Services (MDHHS) correspondence on 3/20/2020 which states "...the Office of Recipient Rights (ORR) and Behavioral Health and Developmental Disabilities Administration (BHDDA) will temporarily suspend enforcement of the written consent requirements to ensure that services are not being withheld or limited due to the inability to get a written consent. It allows for verbal consent of services.

This verbal consent needs to be reported in the Electronic Health Record (EHR) including who provided the verbal consent. If the individual is unable to give verbal consent, then a written signature will be required. It is expected that the CRSP will complete an IPOS addendum including a written signature at the next in-person appointment. Please note, this provision may be subject to change based on MDHHS and DWIHN regulations and requirements.

Sincerely,

*Melissa Moody*

Melissa Moody MS, LLP, MBA

CC: Willie Brooks  
Eric Doeh

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