DMAS and DBHDS are coordinating FAQs and guidance for DD waivers services in Virginia related to COVID-19. Updates to those FAQs are located at DBHDS/Getting Help/COVID 19

Based on recent guidance from CMS that HIPAA compliance will be relaxed during the pandemic, as well as written guidance from AAIDD as to the accepted modalities for completion of SIS® interviews, DBHDS provides this guidance to SIS® vendors.

DBHDS is revising the Virginia SIS® Standard Operating Procedures and Review Process (SOPs) and its associated forms in light of this guidance. Those changes will be shared with SIS® vendors as they have been approved by DMAS.

**Best Practices for Virtual Assessments during COVID-19**

I. **Communication Methods**

In order to ensure the person-centeredness of the SIS® interview process and increase the familiarity of the interviewer with the individual being assessed, it is best practice that some type of visual meeting occur between the interviewer and individual.

A. Ideally this will occur for the duration of the interview via the vendor’s secure designated HIPAA compliant video/audio conferencing account.

B. If the vendor’s designated HIPAA compliant video conferencing account is unavailable, telephonic participation is acceptable.

C. If telephonic participation occurs, best practice is to have brief visual communication between the individual and interviewer via video call on a cell phone, for example.

D. DBHDS does not advise the use of non HIPAA compliant video communication software to conduct the entire assessment.

II. **Interviewer Guidance**

The use of electronic communication to conduct SIS® assessments requires additional awareness on the part of the interviewer that he/she must facilitate introductions between respondents and themselves. In addition, the interviewer must provide ample verbal facilitation so all respondents feel included and heard.

A. The interviewer should make a notable attempt to connect with the individual by addressing him/her directly at the beginning of the assessment.

B. Interviewers should remind respondents that given that the interviewer has no direct knowledge about the individual it is essential that respondents provide accurate and thorough information about the person.

C. SCs especially should be reminded that their unique role as the coordinator of waiver services means they need to provide active verbal participation if supports are more or less intense than what is being reported.

D. It is essential that interviewers document carefully the basis for their ratings and decisions.
E.  It is recommended that the interviewer take a few moments after ratings are complete to
ask if any areas are unclear or need further discussion.

F.  Interviewers should note the primary way in which the interview was conducted and any
challenges or obstacles encountered as a result.

III.  Respondent Signatures

A.  At the beginning of the assessment, the interviewer will document the names of all
participants and note the means by which each participated on the Virginia Standard
Operating Procedures (SOPs) Checklist for the SIS® Interview Participation log, as well as the
time at which this activity occurred.

B.  Immediately following the session, the interviewer will verbally review the Virginia Standard
Operating Procedures (SOPs) Checklist for the SIS® Interview with participants and will ask
for their verbal agreement/disagreement with these items. The interviewer will note the
responses and the time at which they were obtained, on the form.

C.  If a respondent must leave before the interview has ended, he/she will be asked before
leaving to indicate his/her agreement or disagreement that SOPs were followed while
he/she was present.

IV.  Scheduling Guidance

As concerns about the spread of COVID 19 increase DBHDS understands it is likely fewer face to face
assessments will occur. Within the guidance for virtual communications specified above, it is
understood that many, if not most, interviews will be conducted by virtual communication means.

A.  If face to face interviews are scheduled, it is fully acceptable for them to actually be
conducted by virtual means when the time comes.

B.  Contingent on updates about COVID 19, DBHDS will allow scheduling of virtual interviews
through a specified timeframe. Once scheduled to occur via virtual means, these interviews
may proceed by virtual means.

C.  Should vendors experience resistance from SCs or providers regarding use of virtual
communication or permitting scheduling of the assessment during the pandemic, the
vendor will contact the SC Manager and RSS for assistance in resolving the issues at hand.

D.  DBHDS is aware that there may be circumstances, such as the absence or inadequacy of an
internet or telephonic account or the lack of familiarity with communication software that
may prevent completion of the assessment. In these cases, the vendor should document the
reason the assessment cannot be scheduled and move ahead with scheduling other
assessments.

E.  It is noted that individuals in such circumstances will be expected to move ahead with
scheduling and completion of the assessment when the pandemic is deemed to be under
control or when the obstacle preventing the assessment is resolved.