DATE: March 26, 2020
TO: Recreational Therapists, Administrators, Managers
FROM: Brent Wolfe, PhD, CTRS, FDRT, ATRA Executive Director
RE: Recreational Therapy and Telehealth
PRIORITY: Urgent

As facilities, agencies, and organizations are working to provide services within the midst of the COVID-19 pandemic, much attention is being placed on telehealth, remote communications, and providing services from a distance. This memo is to provide guidance in two areas: recreational therapists and the usage of telehealth approaches and appropriate telehealth techniques and mechanisms.

According to the United States Department of Health and Human Services (DHHS):

During the COVID-19 national emergency, which also constitutes a nationwide public health emergency, covered health care providers subject to the HIPAA Rules may seek to communicate with patients, and provide telehealth services, through remote communications technologies.

Some of these technologies, and the manner in which they are used by HIPAA covered health care providers, may not fully comply with the requirements of the HIPAA Rules.

As healthcare providers, recreational therapists may provide services via telehealth mechanisms and other remote communication technologies as identified by the DHHS. Recreational therapists are encouraged to adhere to this recommendation and follow all applicable HIPAA regulations in the provision of care via telehealth technologies. Additionally, recreational therapists are encouraged to recognize that “public-facing” video technologies such as Facebook Live, Twitch, Tik Tok, and other similar platforms are not recognized as HIPAA compliant and should not be used by recreational therapists in the remote delivery of healthcare services (e.g., telehealth). The full DHHS guidelines for the provision of services via telehealth can be found on the DHHS website.

Where appropriate and deemed beneficial, recreational therapists should provide services via all approved and HIPAA compliant means of telehealth.