

Document No. 1

Telehealth Statement on Occupational Therapy



VISION STATEMENT:

A world where all people participate in meaningful occupations to optimize their life experience.

MISSION STATEMENT:

OTAC is the collective voice that serves, promotes, and supports the profession of occupational therapy and its practitioners.



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Amid the COVID-19 (Coronavirus) pandemic, the frontier of business and healthcare models are rapidly changing. To practice social distancing and provide a triage service, the Trump Administration announced the expansion of the telehealth coverage of Medicare. Since March 6, 2020, the Center of Medicare and Medicaid Services (CMS) is increasing Medicare's telehealth benefits under the 1135 waiver authority and the Coronavirus Preparedness and Response Supplemental Appropriations Act temporarily until declared otherwise (CMS.gov, 2020).

Although telehealth coverage through Medicare is not covered for occupational therapy (OT) services, OT telehealth services may be covered through Medicaid and other private insurances. It is the responsibility of the service provider to check coverage before administering telehealth services (Medicaid.gov, 2020).

Summary

- Client's should consent to telehealth services (verbally or in writing)
- Telehealth services should be documented in their record of occupational therapy care, just as you would document face-to-face services
- You should bill the services you provide using CPT codes or local codes (Medi-Cal or DHS), the same codes you would use for face-to-face services
- You should append a modifier to your claim indicating that the service was provided via telehealth (this is usually the G0 modifier, but consult with your payer)
- CMS is providing guidance on the use of "e-visit" codes by occupational therapy, physical, and speech-language pathologists
- Due to a HIPAA waiver, you do not need to use a HIPAA compliant platform at this time; however, that is always best practice
- While it's evolving, there is a loosening of licensure portability regulations at this time, making it possible to provide services across state lines (the site of service is always the location of the client, not the payer or the practitioner)
- Be advised that you may or may not be reimbursed for services you provide via telehealth. The resources and guidance provided by OTAC, AOTA, and other professional associations in no way guarantees reimbursement or payment for your services.

Accompanying Documents to the Telehealth Statement on Occupational Therapy:

- *Document No. 2:* Telehealth Statement on Occupational Therapy – Frequently Asked Questions (FAQs)
- *Document No. 3:* References for Telehealth Documents 1 and 2
- *Document No. 4:* OT and Telehealth Amid COVID-19 – A Matrix of References/Resources
- *Document No. 5:* Waiver or Modification of Requirements Under Section 1135 of the Social Security Act (March 13, 2020)

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Source: OTAC expresses its appreciation to Katie Jordan, OTD, OTR/L, and Jee Eun Jennifer Lai, OTS, for researching and compiling this important information. *March 19, 2020*