Occupational Therapy Telehealth Decision Guide

Start Process →

- ❑ **Review AOTA's Position Paper on telehealth occupational therapy**
  [AOTA Position Paper on Telehealth](#)

— **Yes** →

- ❑ **Does the state where I am licensed and the state where the patient is located allow telehealth occupational therapy?**

  Consult AOTA's Telehealth Resources

— **Yes** →

- ❑ **Does my facility/agency/supervisor support telehealth occupational therapy?**

No ↓ (from second box)

No ↓ (from third box)   **Yes** ↓ (from third box)

❑

Address Patient Care Needs
- ❑ Identify alternatives to meet client care needs
  - Provide in-person therapy, refer to other OT provider, mobilize family caregivers, etc.

Consider Advocacy

If your state or facility does not authorize telehealth occupational therapy services:
- ❑ Consider advocacy for OT to provide telehealth
  - • AOTA Legislative Action Center
  - • Reach out to state OT association
  - • Reach out to [AOTA State Affairs](#)
- ❑ Consider facility advocacy
  - • Share AOTA resources with supervisor or administration

Review Population and Payer Information (see AOTA payer table)
- ❑ **Telehealth coverage** in Home health, Outpatient Rehab, Inpatient Care, Schools, Early Intervention (EI) varies by payer
- ❑ **Payer information** changes frequently
  - ❑ Be aware of your primary payers
  - ❑ Check primary payer coverage frequently
  - ❑ Review AOTA Commercial Payer Telehealth Chart
  - ❑ Review Medicare Telehealth Waiver Update for OT
  - ❑ Sign-up for provider bulletins from payers to receive coverage updates
  - ❑ Each payer approaches reimbursement for telehealth differently, and in the current environment information is changing rapidly (e.g. Medicaid coverage varies by state, some plans require in-person evaluation, but may pay for follow-up telehealth visits, etc.)
- ❑ **Consider billing codes**, modifiers, and place of service used by payers
  - ❑ American College of Rehabilitation Medicine (ACRM) Webinar — [Telehealth Resources for Occupational Therapy](#)
  - ❑ For Medicare — Billing Telehealth Service to Medicare (AOTA)
  - ❑ Reach out to payers to discuss options if needed
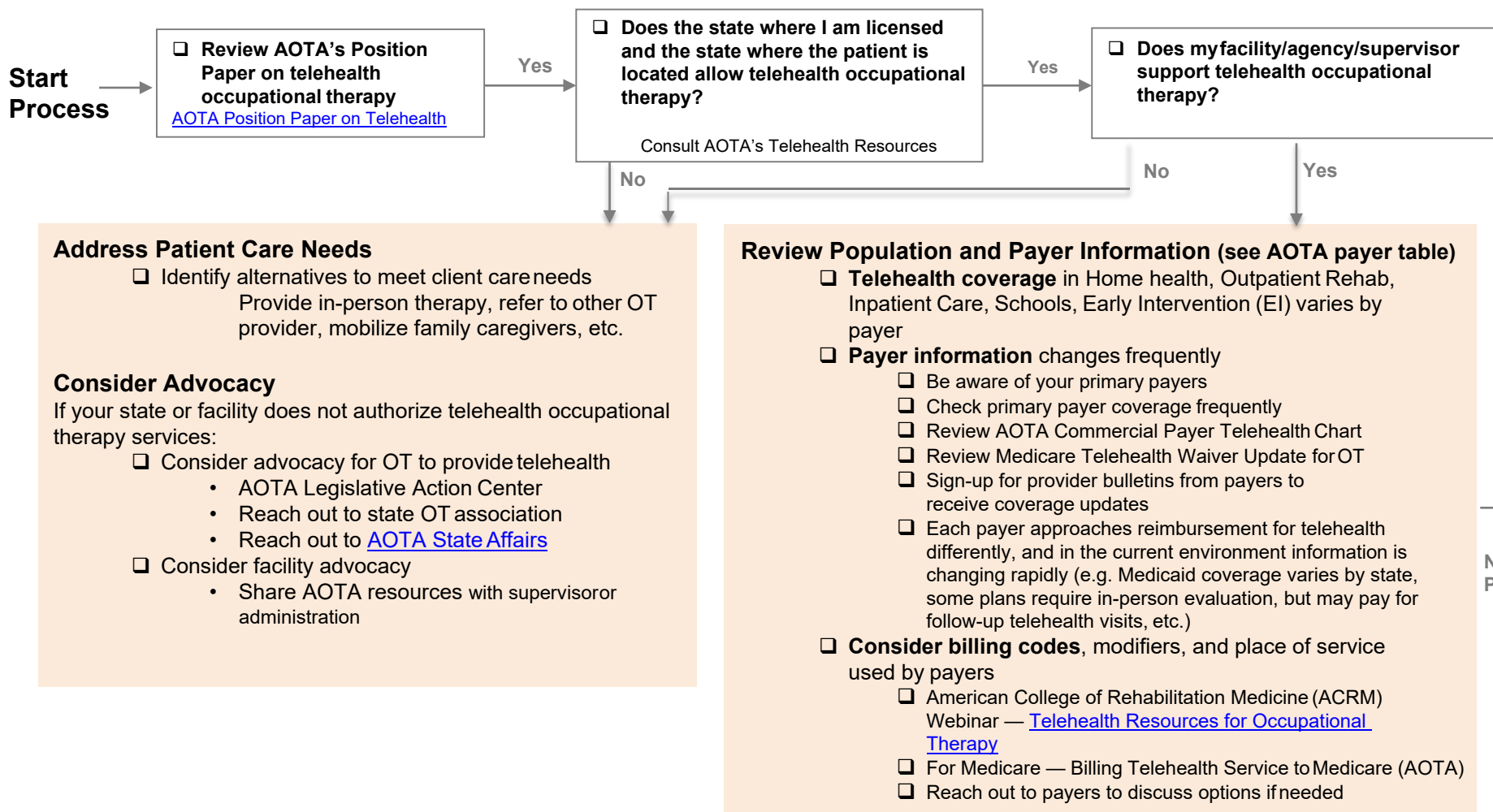
→ **Next Page**

Updated: 12/22/2020

AOTA American Occupational Therapy Association

Occupational Therapy Telehealth Decision Guide

Implementing Telehealth
Regulatory Considerations
- ❑ [Consent requirements](#), which may vary by state and payer
- ❑ HIPAA Compliance [during COVID-19 Pandemic](#) and [enforcement discretion](#)
- ❑ [Business Associate Agreements](#)
- ❑ Facility HIPAA Privacy Statement
- ❑ [FERPA](#) Compliance (for educational environments)
- ❑ State Licensure
  - ❑ Location of both practitioner and client affects telehealth regulation (confirm location of client during each visit)
  - ❑ OTA ability to provide telehealth varies by state and payer
- ❑ Confirm coverage for telehealth with professional liability carrier

Technical Considerations
- ❑ Equipment/Modality, including Video Cameras
- ❑ Hardware and Software
- • [HHS HIPAA Compliant Platforms](#)
- ❑ Internet Bandwidth
- ❑ Technical Support
- • [Health IT Playbook — Learn More About Telehealth](#)
- • [National Telehealth Technology Assessment Resource Center](#)

Clinical Decision Making
- ❑ Risk/Benefit Analysis
  - ❑ Specific patient ability to benefit from telehealth
- ❑ Treatment Must be Client Centered
  - ❑ Continue to rely on the AOTA OT Practice Framework and the Occupational Therapy Code of Ethics
- ❑ Timing Considerations—benefits of synchronous vs. asynchronous sessions
- ❑ Ethical Considerations
  - ❑ Practitioner competency with telehealth- consider competency checklist
  - ❑ AOTA Advisory Opinion for the Ethics Commission
- ❑ Documentation of Services per AOTA Guidelines
  - ❑ Consider telehealth specific documentation requirements with [AHIMA Telemedicine Toolkit](#)
- ❑ Track Outcomes
- ❑ Patient Satisfaction Survey—Continue to Gather Feedback

Additional Telehealth Resources
- ❑ [AHRQ Sample Telehealth Consent Form](#)
- ❑ AOTA Telehealth Resources
- ❑ [American Telemedicine Organization](#)
- ❑ [FERPA and Virtual Learning](#)
- ❑ [gpTRAC Checklist for Initiating Telehealth Services](#)
- ❑ [HHS Telehealth Information](#)
- ❑ [National Consortium of Telehealth Resource Centers](#)
  - ❑ [COVID-19 Telehealth Toolkit](#)
- ❑ [Telehealth Etiquette](#)
- ❑ [TelehealthShare](#)

American Occupational Therapy Association