Occupational Therapy Telehealth Decision Guide

Start Process

Yes → Does my state allow telehealth occupational therapy?
AOTA State-by-State Chart of Telehealth Laws
AOTA State Actions Affecting OT — COVID-19

No → Address Patient Care Needs

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

Yes → Does my facility/agency/supervisor support telehealth occupational therapy?

No → 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
  - AOTA How to get Involved
  - 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
    - Reach out to payers to discuss options if needed

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### 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
  - 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
- AOTA Webinar: From Onsite to Online: Addressing Students’ Needs Through a Telehealth Service Delivery Model
- 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
- Telehealth Share