



## **EPH Telehealth Services for Occupational, Physical, and Speech Therapy**

### **In this document, "TELEHEALTH" services are defined as:**

Health-care services, other than telemedicine medical services, delivered by a health professional licensed, certified or otherwise entitled to practice in Texas and acting within the scope of the health professional's license, certification or entitlement to a patient at a different physical location other than the health professional using telecommunications or information technology.

### **Service Delivery Model for Telehealth for El Paso Health Providers:**

Telehealth may be delivered in the following format:

- Clinician interactive model is a synchronous, real time interaction between the provider and member via a live transmission.

Note: CANNOT be provided by telephone or live chat.

All confidentiality and Health Insurance Portability and Accountability Act (HIPAA) standards apply to Telehealth transmissions. However, a HIPAA Temporary Waiver from the Office of Civil Rights has been issued, temporarily waiving HIPAA compliant software/product(s).

### **El Paso Health Requirements for the Use of Telehealth by OT, PT, and ST**

1. Telehealth is a temporary approval in response to the national emergency from COVID-19, El Paso Health has approved alternate service delivery via Telehealth from **March 20, 2020 and remains in effect until rescinded.**

Note: Decisions to extend this period will be based on further review and information received from The Centers for Medicare and Medicaid Services (CMS) and the Health and Human Service Commission (HHSC).

2. El Paso Health providers should obtain consent from the client/parent for Telehealth services. The consent can be obtained via fax, email, or verbal with documentation. A verbal consent will be allowed temporarily due to COVID-19. Provider should request written consent, as is required, for their medical record after the COVID-19 situation has resolved.

3. El Paso Health Plan will temporarily honor existing authorizations for OT/PT/ST services with a prior authorization on file. Providers **do not** need to request amendments (changes) to existing authorizations to be able to provide Telehealth services.
4. HHSC has issued updated guidance related to the COVID- 19, 90- Day Extension for Prior Authorizations. Extensions and prior authorizations will only be extended with end dates between April 22, 2020 and December 31, 2020.  
**It is not necessary for a Provider to request an override of a current 90-day extension. Providers will need to follow the current prior authorization process and request a new authorization for services. Please submit the Texas Standard Prior Authorization Request Form along with all necessary documentation. The 90- day extension will be terminated the day prior to the new date of service (DOS) on the new authorization. This will prevent any lack of coverage days.**
5. El Paso Health will reimburse Telehealth services according to the Texas Medicaid fee schedule for the approved procedure codes.
6. El Paso Health providers must submit claim forms using standard billing procedures for Telehealth services using the modifier 95 in Box 24D, in addition to any other required modifiers; and 02 in Box 24B for “place of service (POS)”. Providers should continue to utilize the modifier, UB, for Physical Therapy Assistants, Certified Occupational Therapy Assistants, and Speech Therapy Assistants.
7. CHIP copayments will not be required for any covered service delivered via Telemedicine or Telehealth.
8. Evaluations, Re-evaluations, and Physician Referrals: Providers should continue to do evaluations, re-evaluations, and obtain referrals from ordering providers as recommended by the Texas Medicaid Provider Procedures Manual January 2021.

9. El Paso Health will allow Physical Therapy Assistants, Occupational Therapy Assistants, Speech Therapy Assistants, and Speech Language Pathology Interns to provide services remotely using telehealth, as directed by their supervisor, according to the assistant's practice and duties. The same code of ethics and professional standards apply whether a client is seen via Telehealth or an in-person visit. The utilization of assistants will remain in effect until terminated by the Office of the Governor or until the March 13, 2020 disaster declaration is lifted or expires.

**Additional requirements:**

A provider shall comply with the Texas Administrative Commission's Code of Ethics and Scope of Practice requirements when providing Telehealth services (TAC111.212).

- A. The scope, nature, and quality of services provided via Telehealth are the same as that provided during in-person sessions by the provider.
- B. A provider shall consider relevant factors including the client's behavioral, physical, and cognitive abilities in determining the appropriateness of providing services via Telehealth.
- C. A provider shall contemplate time considerations and a decrease in units per session if deemed appropriate for providing services via Telehealth.
- D. As pertaining to liability and malpractice issues, a provider shall be held to the same standards of practice as if the Telehealth services were provided face-to-face.
- E. Telehealth providers shall comply with all laws, rules, and regulations governing the maintenance of client records, including the specific Telehealth program that was utilized and the materials utilized in the Telehealth session.

