



July 27, 2021

## Telehealth Frequently Asked Questions

### Duration of Telehealth Services

Cook Children's Health Plan will continue to reimburse for Telehealth for Occupational, Physical, and Speech Therapy at this time. We will provide notification if changes are made regarding Telehealth services.

### Evaluations, Re-evaluations, and Physician Referrals

Providers should continue to do evaluations, re-evaluations, and obtain referrals from ordering Providers as recommended in the Cook Children's Health Plan Therapy Services Handbook. Please refer to State Practice Acts and Rules for each discipline for guidance on if a discipline is required to be performed face to face.

Evaluations provided via Telehealth will be accepted, however, Providers should document clearly what was conducted and the methods used to collect assessment data. While it is recognized that some components on standardized testing cannot be conducted via Telehealth, the therapist should gain information from subtests which are appropriate as well as criterion-referenced checklist and other appropriate means.

Per Health and Human Services (HHSC), "Clinical evaluations required for the provision of new complex rehabilitation technology, such as power mobility and adaptive seating systems or augmentative communication devices, require the physical presence of the speech language pathologist, occupational therapist, or physical therapist and should not be delivered via Telehealth unless exceptional medical circumstances exist."

### Method for Telehealth Delivery

Cook Children's Health Plan does not allow the use of telephone-only delivery of Physical Therapy (PT), Occupational Therapy (OT), or Speech Therapy (ST). Texas licensure rules for each discipline addresses the provision of Telehealth via two-way audio/video platforms. Although there are variations between the disciplines' rules, each requires the therapy service to meet an equivalent standard of care to in-person delivery.

### **Consent and Provision of Telehealth**

Therapy Providers should obtain consent from the Member or responsible adult to perform therapy via Telehealth. If written consent is not possible, the Provider should document verbal consent in the Member's medical record.

Cook Children's Health Plan requires that a responsible adult participate in the therapy session for Members under thirteen (13) years of age or in cases where the Member cannot participate without assistance. Therapy Providers should document the location of service, the level of assistance provided and by whom within the clinical documentation.

If the Member is not able to participate in Telehealth or if it cannot be delivered to an equivalent standard of care as face-to-face interaction, therapists are encouraged to notify the health plan by email at [CCHPPriorAuthorizations@cookchildrens.org](mailto:CCHPPriorAuthorizations@cookchildrens.org). The therapist may also contact the Member's Service Coordinator to develop a plan of care and alternatives as needed to ensure the health and safety of the Member.

### **HIPAA Requirements for Telehealth**

The Office of Civil Rights (OCR) has relaxed HIPAA requirements to allow for the use of additional video capabilities to deliver services via Telehealth. Texas Medicaid will recognize OCR's HIPAA enforcement discretion as it relates to Telehealth platform requirements.

### **Out of Network**

Out of Network therapy services continue to require prior authorization for all therapy services. Please refer to the Cook Children's Health Plan Therapy Services Handbook for further guidance.

### **Therapy Assistants and Interns**

Therapy assistants may provide Telehealth within the boundaries of practice guidelines. Providers should refer to State Practice Rules and National Guidelines regarding supervision requirements for each discipline as related to Telehealth.

*\*All of the above stated information is subject to change pending guidance from HHSC and other governing bodies. Cook Children's Health Plan will work to notify Providers as quickly as possible with updates.*

### **Resources**

Cook Children's Health Plan Therapy Services Handbook