AMENDED MEMORANDUM (DMS-04 a)

To: Medicaid Providers

From: Division of Medical Services (DMS)

Date: March 30, 2020

Re: Use of Telemedicine to Provide Occupational, Physical and Speech Therapy by licensed Assistants during COVID-19 Outbreak

Amended on April 24, 2020

As authorized by the Governor’s Executive Order 20-06 and Order 20-16, regarding the public health emergency concerning COVID-19, and power delegated to the Governor by Arkansas Code Annotated § 12-75-114, the following agency rules are identified as preventing, hindering, or delaying the agency’s ability to render maximum assistance to the citizens of this state and are hereby suspended for the duration of the declared public health emergency, unless otherwise stated:

Section 214.210 in the Occupational, Physical, Speech Therapy Provider Manual, regarding originating site requirements applicable to licensed PT, OT, and ST therapy assistants providing limited occupational, physical, or speech therapy services.

The telemedicine parental consultation code will be available and billable on April 10, 2020, and regular therapy assistant codes will be billable on April 3, 2020. Regular therapy codes and parental consultation codes will be retroactive to dates of service, March 27, 2020. The services will be available to established patients only.

In response to the COVID-19 outbreak in Arkansas and consistent with CMS’s coverage and payment for COVID-19 diagnostic testing, DMS is adding an addendum to the guidance issued on March 20th in (DMS-04) which suspended the prohibition on use of telemedicine technology for limited occupational, physical, or speech therapy services provided to established patients during the COVID-19 outbreak and the declaration of public health emergency. This addendum expands allowable telemedicine services to include services provided by licensed occupational, physical, or speech therapy assistants.

Parental Consultation

Parental consultation is a service that allows a therapist assistant to instruct a parent or caregiver on how to use therapeutic equipment or techniques with their child to continue working on therapy goals and objectives.

To bill for this service, the therapy assistant must document that the parent or caregiver was present with a beneficiary under age eighteen (18). The service must be provided using the appropriate real-
time technology that includes both a video and audio component. The originating service requirement is relaxed so that the parent can receive this service from their home.

The service may be provided in 15-minute sessions with a maximum of 8 sessions per month. An extension of benefits may be requested if medically necessary. All services must be prior authorized by eQHealth Solutions. When requesting a PA through the eQHealth portal, the process type is the same process type used for PT/OT and SLT.

**Individual Therapy Services provided by a licensed Physical Therapist, Occupational Therapist, or Speech Therapy Assistant**

To allow for continued therapy services for established patients during this time of social distancing, DMS is lifting the requirement that the beneficiary be located at a healthcare facility (originating site) to receive telemedicine services for the following services only:

- Individual Physical Therapy provided by a licensed Physical Therapy Assistant
- Individual Occupational Therapy provided by a licensed Occupational Therapy Assistant
- Individual Speech Therapy provided by a licensed Speech-Language Pathologist Assistant

Parental or caregiver involvement is required during the session. Additionally, the technology used must be real-time and include a video and audio component. The sessions are limited to thirty minutes a piece, with a maximum of three (3) sessions per week. An extension of benefits may be requested if medically necessary.

The following services **cannot** be completed via telemedicine:

1. Evaluations and re-evaluations. However, if an annual evaluation is due during this time, the deadline may be extended until the patient is able to come into the office.
2. Group Services.

The allowable codes for these rule suspensions:

- Parental Consultation
  - T1014- UB, U1 Physical Therapy Assistant
  - T1014- UB, U2 Occupational Therapy Assistant
  - T1014- UB, U3 Speech Language Therapy Assistant

When billing for these services you must include all modifiers on the claim. For Parental Consultation, please make note of the different modifiers per discipline. **All Therapy claims submitted for Telemedicine must include the GT modifier and “02” as the place of service.**

**To ensure quality and consistency of care to Medicaid beneficiaries, DMS will coordinate with the Office of the Medicaid Inspector General (OMIG) to conduct retrospective reviews and audits of these services during this time. Please keep all records of services as required by Medicaid physician billing and telemedicine rules.**

If you have any questions on billing please contact Portland Gilbert at Portland.Gilbert@dhs.arkansas.gov