

## MCO Guidance: Telehealth for Physical, Occupational, and Speech Therapy

- HHSC does not allow the use of telephone-only delivery of physical therapy, (PT), occupational therapy (OT), or speech therapy (ST).
  - Texas licensure rules for speech-language pathology, occupational therapy, and physical therapy address 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.
  - Each discipline's rules allow for evaluation and treatment to be delivered via telehealth, as determined clinically appropriate by the rendering therapist.
  - If there is a client in need of therapy and telehealth is not an option or cannot be delivered to an equivalent standard of care as face-to-face interaction, therapists are encouraged to contact the health plan and/or service coordinator to develop a plan of care and alternatives as needed to ensure the health and safety of the member.
  - Access to free or low-cost internet services is available for under-served communities, including individuals over 65 and SNAP beneficiaries, if that presents a barrier to audiovisual interaction with a provider.
- The Office of Civil Rights (OCR) has relaxed [HIPAA requirements](#) for telemedicine and telehealth 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.
- For children and some youth and adults, teletherapies may require participation of a parent or caregiver.
- 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.
- Therapy assistants may provide telehealth and receive supervision within limits outlined in each discipline's rules. Providers should refer to State Practice rules and National Guidelines regarding supervision requirements for each discipline.
- Telehealth requires consent from the member or responsible adult. Verbal consent is permissible and should be documented in the member record.

- Providers should use the modifier 95 on claims to indicate remote delivery.
- This guidance applies to both state plan therapies and those therapies delivered through the STAR+PLUS home and community based services waiver.