

Provider Guidance: OT/PT/SLP Direct-to-Patient Teletherapy during COVID-19 Outbreak

This document provides clarity on VUMC's guidelines for teletherapy services as of April 9, 2020.

During the COVID-19 outbreak emergency declaration period, VUMC therapy patients can be seen while they are at home via telehealth within My Health at Vanderbilt. VUMC has made telehealth options available for all in-network patients. See "Out of Network and Uninsured Patients" section below for important information on avoiding claims denials and patient surprise bills.

Work with your Revenue Cycle advisor if you have questions about a given payer's coverage policies for teletherapy. Patients complete telehealth visits from their My Health at Vanderbilt (MHAV) account. Providers access telehealth visits via the Epic Whiteboard.

State Licensure and Scope of Practice

Despite recent consumer news about the federal government's position on this issue, licensure and scope of practice are determined by each state. As of today, OT/PT/SLP providers can care for patients who are physically located in Tennessee and/or any state where the provider is currently licensed.

Documentation Requirements

Use the following smart phrase at the beginning of your note:

This service was provided via telemedicine using two-way, real-time interactive telecommunication technology between the patient and the therapist. The interactive telecommunication technology included audio and video. The patient was offered telemedicine as an option for care delivery and consented to this option.

Include the following information in your note:

- Patient location: ***, Tennessee
- Other participants present with provider, with patient's verbal consent:***
- Other participants present with patient: ***
- Provider location
- HPI and other histories as you normally would obtain
- Applicable exam elements that you can obtain via observation
- Therapy progress and plan revisions, as you would
- Time spent on the telehealth encounter

Be sure your therapy plans are amended and re-certified as needed for a temporary change to teletherapy.

Coding

Complete and sign your progress note as always, and based upon the therapy services provided, enter your appropriate technical charges (for hospital-based therapy departments) or professional charges (for therapists enrolled as billing providers). All teletherapy encounters must also include modifiers GT and CR.

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Prepare your computer or device for Telehealth

Telehealth visits are completed via eStar.

- Instructions for Canto for iOS: <https://getestar.vumc.org/pdf/cantoiOS.pdf>
- Instructions for personal computer:
 - Download the latest version of VMWare at: <https://virtual.VUMC.org>
 - Select: "Install VMware Horizon Client"
 - Select: "eStar" (Do not select "Win10 CWS-Prod")
 - Reminder: make sure to enter eStar from VMware, rather than from the HTML link

Technology

It is essential to ensure appropriate documentation, protect patient privacy and maintain cybersecurity efforts. Therefore, VUMC providers must continue to use the existing VUMC-approved telehealth platform. This means that providers and patients can only communicate by using My Health at Vanderbilt.

Alternative Video Technologies

In the event that a provider and patient are unable to connect via My Health at Vanderbilt and eStar, and the provider and patient wish to continue with a telehealth visit (instead of converting to an audio-only discussion) the following applications may be used as a backup method to provide an audio/visual connection: Zoom, Apple FaceTime, Facebook Messenger video chat, Google Hangouts video, Whatsapp video chat, or Skype (Approved Applications). VUMC prohibits using remote communication products, such as Doximity, doxy.me, TikTok, Facebook Live, Twitch, or a chat rooms such as Slack.

In the unlikely event that one of these Approved Applications is needed, the provider must include the **.TelemedicinePlatform** smart phrase in the clinical documentation:

"At patient request, *** audio/visual application was utilized to complete this encounter."

The provider must also select the appropriate encounter type (Telemedicine) and coding modifiers described above. In addition, the provider must notify the patients that, while VUMC believes these applications to be secure, platforms outside MHAV potentially introduce privacy risks.

The use of these Approved Applications should be used only as a last resort, and only during the COVID-19 pandemic.

Providers Work Location & Privacy Considerations

Providers can conduct telehealth visits from any private setting where the provider has full access to eStar. This includes the provider's home. It is best to find a room with a door so you have control over who can hear your conversation. Family members or others in your home or off-site workspace are typically not members of VUMC's trained workforce and should not be able to see or hear your telehealth visits.

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Out of Network and Uninsured Patients

New out of network patients and new uninsured patients will go through the same Office of Outpatient Referral Assistance screening process as they would for in-person new patient appointments. Without this careful screening, insurance plans where VUMC is out-of-network or not an enrolled provider will deny the telehealth service. The patient may receive an unexpected bill for your visit.

Patients may receive a bill for telehealth visits if their individual insurance plan considers telemedicine visits as “non-covered services” or if VUMC and/or our providers are “out of network.” To avoid “surprise billing” to these patients, please verify coverage and communicate the insurance coverage or lack thereof with the patient or obtain OORA approval prior to the encounter.

Therapy Students

Therapy students participate in teletherapy visits solely in the context of their educational program. The therapist must be present on and participating in the teletherapy visit whenever a therapy student is also participating.

eVisits and Phone Visits

Therapists are asked not to use the eVisit codes for extended MHAV messaging (G2061-G2063) or phone visit codes (98966-98968) at this time. More guidance on the use of these codes will be forthcoming.

Provider Training and Resources

On-demand and live training sessions are available via [The Learning Exchange](#) by searching for “COVID Telehealth”.

Technical Assistance

Please call the VUMC Help Desk with questions at 343-4357, Option 4, or submit a request to Pegasus at <https://pegasus.mc.vanderbilt.edu/>.